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Listed under 'E'

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

THE EUREKA COMPANY
BLOOMINGTON, ILLINOIS
ILD 001 163 823

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EPA Region	:	5
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Eureka Company (Eureka) facility in Bloomington, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

Eureka is a manufacturer of vacuum cleaners. Operations at the 24.2-acre Eureka facility began in 1958. The facility generates waste plating sludge (F006) containing chromium, nickel, and zinc; paint wastes (D001 and D002); spent Stoddard solvent (F001); and a variety of nonhazardous waste oils. The facility has an interim status container storage area permitted to store 38,500 gallons. Eureka is in the process of closing this container storage area.

The PA/VSI identified the following 48 SWMUs at the facility. No AOCs were identified.

Solid Waste Management Units

Plant 1

1. Parts Washer with Oil Separator and Drum Satellite Accumulation Area (DSAA)
2. Alkaline Parts Washer and DSAA
3. Old 1,1,1-Trichloroethane (1,1,1-TCA) Vapor Degreaser SAA
4. DSAA at Sodium Nitrate Deburrer
5. Scrap Coolant DSAA
6. Oil Recovery Centrifuge Satellite Accumulation Area (SAA)
7. Waste Oil and Stoddard Solvent Waste Accumulation Area
8. Steel Grinding Room Dust Collector
9. New Hazardous Waste Container storage area
10. Zinc Plating Area Sumps
11. Zinc Filter DSAA
12. Nickel/Chrome Plating Areas 1 and 2 SAA
13. Nickel/Chrome Plating Area 3 SAA
14. Tramp Oil in Alkali DSAA (Ni/Cr Lines 1 and 2)
15. Tramp Oil in Alkali DSAA (Ni/Cr Line 3)
16. Wastewater Treatment Plant
17. Nickel Solution Evaporation Unit
18. Sludge Drier and Dry Sludge Drum
19. Sludge Roll-off Box
20. Scrap Metal Trailer
21. Waste Oil Collection Area (Laser Cutting Machines)
22. Waste Oil DSAA (Building 6)

23. Nickel Strip Area
24. Plastic Mold Injection SAA
25. Building 5 Isopropyl Alcohol (IPA Parts Washer) SAA
26. Parts Washer Wastewater Treatment Plant
27. Paint Mixing Room DSAA
28. Phosphoric Acid Parts Washer SAA (Building 1)
29. Old Paint Solvent Storage Cabinet SAA
30. Paint Spray Room DSAA
31. Paint Chip Collection Drum
32. Stoddard Solvent Washer SAA
33. Forklift Waste Oil and Parts Cleaner SAA
34. Phosphoric Acid Parts Washer (Building 5D) SAA
35. Tool Room Stoddard Solvent and Waste Oil Collection Area
36. Chemistry Laboratory DSAA
37. Paint and Solvents Storage Area

Plant 2

38. Paint Strip Tanks Waste Oil SAA
39. Phosphoric Acid Derusting Area
40. Plant 2 Wastewater Treatment Plant
41. Oil Separator System
42. Oil Separator Drum Staging Area
43. Old Paint Mixing Room DSAA
44. Old Paint Spray Room Waste Cabinet
45. Plastic Injection Molding Area Waste Oil and Solvent DSAA
46. Plastic Injection Molding Area and Dried Paint Collection DSAA
47. Nonhazardous Waste Roll-off Box
48. RCRA Container Storage Area

The facility currently poses a low potential for release to ground water. All the SWMUs identified during the PA/VSI have sound secondary containment. No floor drains exist throughout the facility. Releases that may have occurred prior to paving the container storage area (SWMU 48) will be addressed during the closure of this area. Based on a review of well logs in the area, several wells were found within 1/6 mile of the facility. Based on conversations with city water officials, this area is now supplied with city water and these wells are no longer believed to be in service. A similar situation applies throughout the 3-mile radius of the facility.

All SWMUs currently have secondary containment that would prevent release to surface water. The nearest surface water bodies are some small ponds south of the facility and Sugar Creek, which is 1.5 miles north of the facility. Drinking water for the cities of Bloomington and Normal is drawn from surface water 10 miles from the facility.

The potential for an air release is low. The facility has air permits for several point sources. No violations of these permits were found during the VSI. The container storage area

(SWMU 48) is located outside. The facility is located in a residential area. No sensitive environments were identified during the PA/VSI.

The potential for a soil release is low. No soil contamination is known to exist at the facility. No soil sampling has been done at the facility to date. The facility is fenced and has 24-hour security.

No further action is recommended for the Eureka facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Eureka Company (Eureka) facility in Bloomington, Illinois. The PA was completed on July 14, 1991. PRC gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. The VSI was conducted on July 17 and 18, 1991. It included interviews with Eureka representatives Don Jenkin and Dean Shoemaker and a walk-through inspection of the facility. Forty-eight SWMUs and no AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 52 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

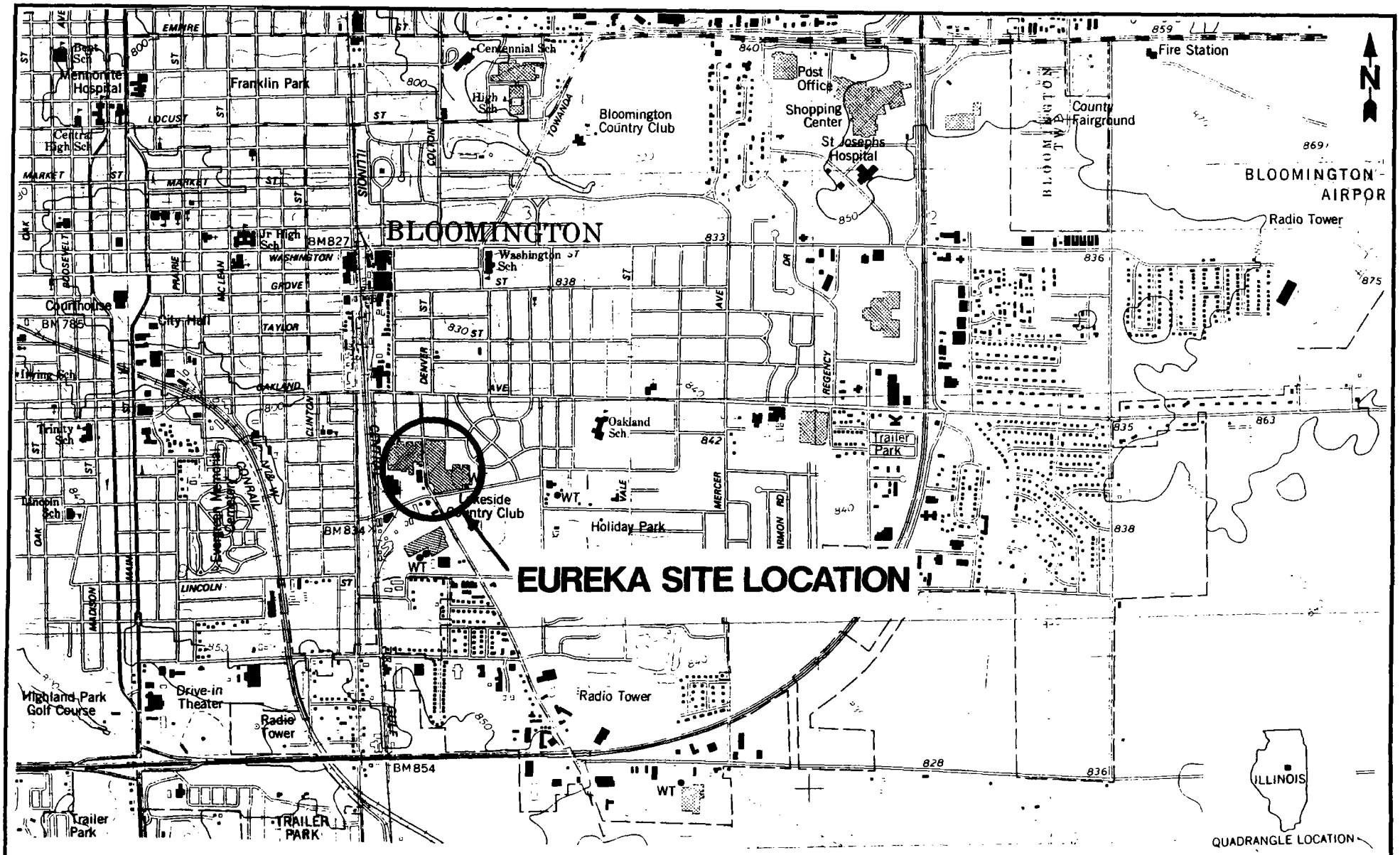
The Eureka facility is located in Bloomington, McLean County, in central Illinois (40° 28' 12" N, 88° 58' 37" W) (see Figure 1). The facility is bordered on the west by Indianapolis Street, on the north by East Bell Street, on the northeast by Maizefield Avenue, on the southeast by O'Conner Street, and on the south by Croxton Avenue. Hannah Street (U.S. Highway 150) runs north-south through the facility. The east portion of the facility is referred to as Plant 1. It includes Buildings 1, 1A, 1B, 2, 3, 4, 5, 5A, 5D, 5E, 6, 6B, 6C, 7, 11, and 12 (see Figure 2). Except for Building 11, these buildings make up one continuous structure. The west portion of the facility is referred to as Plant 2. It includes Buildings 1T, 1AT, 2T, 2AT, 3T, 3AT, 4T, 5T, 6T, 7T, and 8T (see Figure 3). Portions of Buildings 3, 5, 5A, 5T, 6, 6B, and 6C have second floors.

The facility covers a total of 24.2 acres. The area surrounding the facility is predominantly residential with some industry.

2.2 FACILITY OPERATIONS

The Eureka facility manufactures vacuum cleaners. Various operations, processes, and activities are involved in making the vacuum cleaners. These are summarized below.

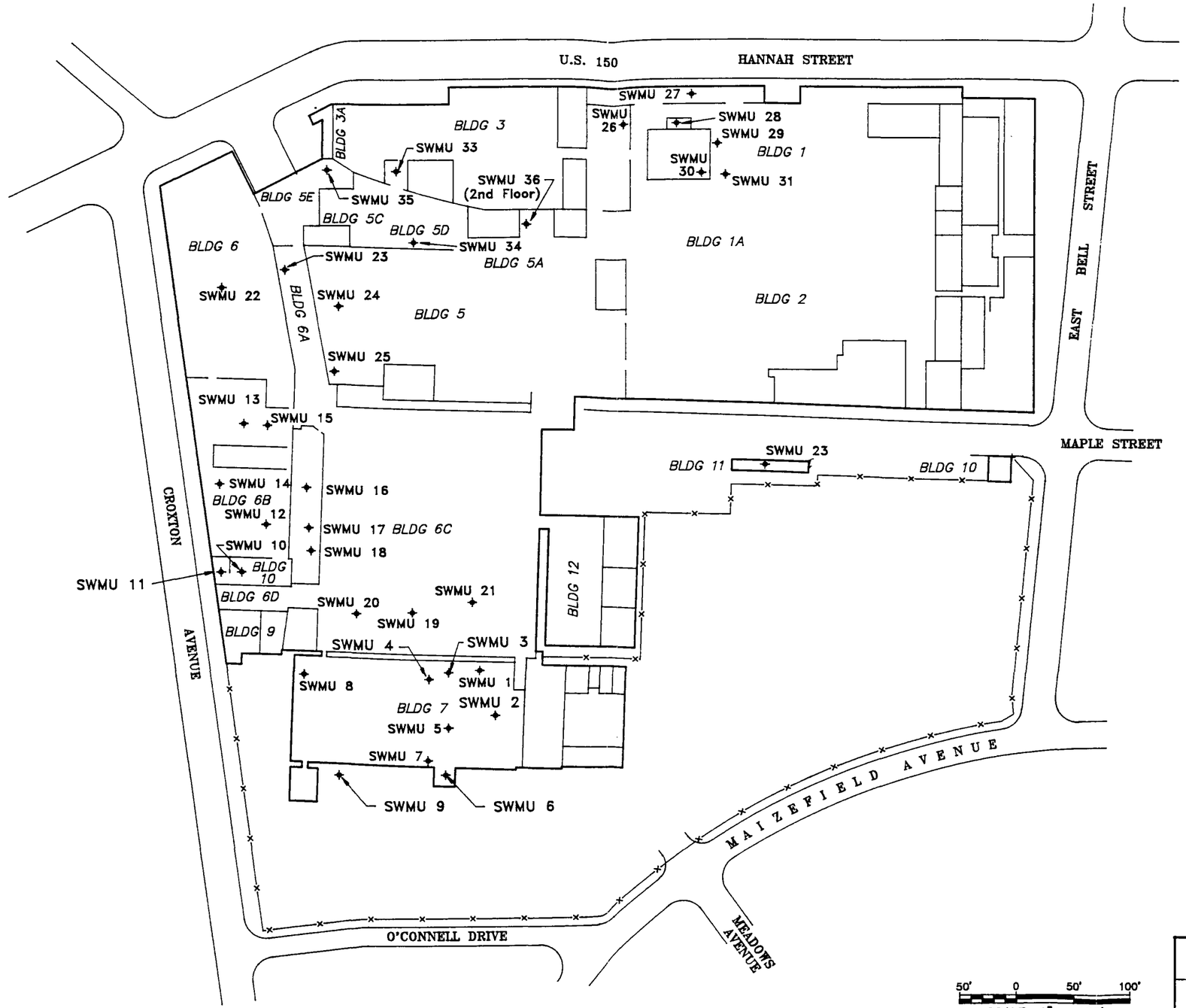
1. Electroplating lines plate nickel and chromium onto vacuum cleaner parts. Passive plating with zinc solutions is also used.
2. The parts are cleaned in parts washers; other materials are also used to wash parts. The parts washer also applies a coating that improves the painting process.
3. Paint is applied to parts in a dip tank or in paint booths.
4. When it is necessary to remove the outer layers of painted or plated parts, a stripping operation is employed that uses potassium hydroxide.
5. Metal parts are cut and drilled in the machine shop, generating waste metal and scrap oil.



THE EUREKA COMPANY
BLOOMINGTON, ILLINOIS

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.



SOURCE: Eureka, 1989.

EUREKA-S.DWG - 08/28/91 - RAO

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FIGURE 2

PLANT 1 – FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

N

INDIANAPOLIS STREET

SWMU 47

SWMU 48

EMPLOYEE PARKING

EMPLOYEE PARKING

SWMU 46

SWMU 45

BLDG 5T

BLDG 6T

McCLUN STREET

CROXTON AVENUE

BLDG 3T

BLDG 2AT

EMPLOYEE PARKING

SWMU 42

SWMU 41

SWMU 43

BLDG 4T

BLDG 2T

SWMU 44

SWMU 40

BLDG 1AT

SWMU 39

BLDG 7T

SWMU 38

BLDG 1T

EAST BELL STREET

U.S. 150

HANNAH STREET

50' 0 50' 100'

SCALE: 1" = 100'

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FIGURE 3

PLANT 2 – FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

EUREKA-N.DWG – 08/28/91 – RAG

SOURCE: Eureka, 1989.

6. Plastic molding machines are used to make plastic parts.

7. Vacuum cleaners are assembled, packaged, and shipped.

Operations at the facility began in June 1958. The facility presently employs about 1,000 people. Wastes are handled in many different areas of the facility. These areas are described individually in Section 3.0. Table 1 lists SWMUs identified at the facility. These units are shown in Figure 2. The facility formerly had four underground storage tanks (UST). These are described below.

The gasoline UST held 560 gallons for refueling Eureka vehicles. The tank was in place from 1980 to 1989. No leaks or soil contamination were found when the tank was removed. Certification for the tank removal is included in Attachment F.

The 1,000-gallon, steel, product solvent UST was in place from 1978 to 1989. The solvent was similar in composition to that currently used in painting operations. No leaks or soil contamination were found when the tank was removed. Certification for the tank removal is included in Attachment F.

Two Plant 1 product USTs were formerly located just north of Building 11. The 500-gallon steel tanks held toluene and paint operation solvent mix. The tanks were in place from 1977 to 1988. No leaks or soil contamination were found when the tanks were removed. Certification for the tank removal is included in Attachment F.

2.3 WASTE GENERATING PROCESSES

Table 2 lists the solid wastes generated at the facility. A complete discussion of each waste is contained in a 1989 IEPA inspection report (IEPA, 1989d) that is the source of most of the information presented in this section. Supplementary information was gathered during the VSI.

2.3.1 Wastewater Pretreatment Wastes

Waste streams from several different operations and sources flow to a central pretreatment system (SWMUs 16, 18, and 19). Here they are treated and discharged to the Bloomington

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Parts Washer with Oil Separator and Drum Satellite Accumulation Area (DSAA)	No	Active
2	Alkaline Parts Washer and DSAA	No	Active
3	Old 1,1,1-Trichloroethane (1,1,1-TCA) Vapor Degreaser	No	Inactive
4	DSAA	No	Active
5	DSAA	No	Active
6	Oil Recovery Centrifuge	No	Active
7	Waste Oil and Stoddard Solvent Waste Accumulation Area	No	Active
8	Steel Grinding Room Dust Collector	No	Active
9	New Hazardous Waste Container Storage Area	No	Inactive
10	Zinc Plating Area	No	Active
11	Zinc Filter DSAA	No	Active
12	Nickel/Chrome Plating Areas 1 and 2	No	Active
13	Nickel/Chrome Plating Area 3	No	Active
14	Tramp Oil in Alkali DSAA (Ni/Cr Lines 1 and 2)	No	Active
15	Tramp Oil in Alkali DSAA (Ni/Cr Line 3)	No	Active
16	Wastewater Treatment Plant	No	Active
17	Nickel Solution Evaporation Unit	No	Active
18	Sludge Drier and Dry Sludge Drum	No	Active
19	Sludge Roll-off Box	No	Active
20	Scrap Metal Trailer	No	Active

21	Waste Oil Collection Area (Laser Cutting Machines)	No	Inactive
22	Waste Oil DSAA (Building 6)	No	Active
23	Nickel Strip Area	No	Active
24	Plastic Mold Injection Containment System	No	Active
25	Building 5 Isopropyl Alcohol (IPA) Parts Washer	No	Active
26	Parts Washer Wastewater Treatment Plant	No	Active
27	Paint Mixing Room DSAA	No	Active
28	Phosphoric Acid Parts Washer	No	Active
29	Old Paint Solvent Storage Cabinet	No	Inactive
30	Paint Spray Room DSAA	No	Active
31	Paint Chip Collection Drum	No	Active
32	Stoddard Solvent Washers	No	Active
33	Forklift Waste Oil Collection Area and Parts Cleaner	No	Active
34	Parts Washer and Oil Skimmer (Building 5D)	No	Active
35	Tool Room Stoddard Solvent and Waste Oil Collection Area	No	Active
36	Chemistry Laboratory SAA	No	Active
37	Paint and Solvents Storage Area	No	Active
Plant 2			
38	Paint Strip Tanks	No	Active
39	Phosphoric Acid Derusting Area	No	Active
40	Plant 2 Wastewater Treatment Plant	No	Active
41	Oil Separator System	No	Active
42	Oil Separator Drum Staging Area	No	Active

43	Old Paint Mixing Room DSAA	No	Inactive
44	Old Paint Spray Room Waste Cabinet	No	Inactive
45	Plastic Injection Molding Area Waste Oil and Solvent DSAA	No	Active
46	Plastic Injection Molding Area Parts Washer and Dried Paint Collection Drum	No	Active
47	Nonhazardous Waste Roll-off Box	No	Active
48	RCRA Container Storage Area	Yes	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit application.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Wastewater and wastewater treatment sludge/F006	Plating water treatment operations	16, 18, and 19
Spent Ni/Cr/Zn plating filters/F006	Plating operations	10, 11, 12, and 13
Solvent-Reduced paint/F003, D001	Painting operations	27, 29, 30, 31, 43, 44, and 48
Spent Stoddard solvent/F001, F002	Maintenance and metal forming operations	7, 32, 33, 34, and 48
Water-reduced paint/NA**	Painting operations	46, 48
Paint strip sludge/NA	Painting operations	38, 40, and 47
Paint pigments and alkali/D002	Painting operations	48
Parts washer sludge/NA	Wastewater treatment operations	26 and 40
Tramp oil/NA	Plating operations	14, 15, 41, and 48
Waste oil/NA	Facility maintenance	1, 2, 4, 5, 6, 7, 22, 24, 28, 33, 34, 35, 38, 41, 42, 45, and 48
Spent paint filters/NA	Painting operations	47
Grinder sludge/NA	Metal forming operations	48
Oil separator sludge/NA	Waste oil treatment operations	48
Dry paint overspray/NA	Painting operations	47
Metal Dust/NA	Metal Working	8
Scrap Metal/NA	Throughout facility	20
IPA Paint sludges/NA	IPA Parts washer	25

Note:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

** Nonapplicable (NA) designates a nonhazardous waste stream.

Normal Water Reclamation District (BNWRD). Treatment in tanks includes chrome reduction, flocculation, clarifying, neutralization, and sludge thickening, and involves sludge filter presses and a sludge drier. The sludge resulting from wastewater treatment is hazardous waste and classified as F006 waste. A flow diagram of the wastewater pretreatment process is included in Attachment D. The following sections discuss the areas at the facility that discharge wastewater to the wastewater pretreatment system.

Eureka has three electroplating lines that apply nickel and chromium plating to vacuum cleaner parts (SWMUs 12 and 13). These lines generate wastes that are discharged via aboveground piping to the pretreatment system. The wastes include rinse water, acid and alkaline cleaning bath solutions, and plating solutions. Sediment generated in the bottoms of the baths is also sent to the pretreatment system.

Wastewater is also generated from a zinc barrel electroplating line (SWMUs 10 and 11). The wastewater, which includes rinse water, acid and alkaline cleaning bath solutions, and plating solutions, is sent to the pretreatment system. Sediment generated in the baths is also sent to the pretreatment system. The zinc line has a chrome dip tank for corrosion prevention. A part can go to one chrome dip tank and get blue finish; another chrome dip tank previously used for gold finish is now used for water rinsing only. Neither of the chrome dip tanks has been electrically charged. Baths associated with the chrome-dipping operation discharge to the on-site pretreatment system.

The nickel and chrome plating occasionally has to be removed from a part. Rinse waters and acid and alkaline solutions from the plating-strip operation are discharged to the pretreatment system. When sediment in the stripping tank is cleaned out, the stripping solution (hydrochloric acid) is pumped to a tank and the sediment is flushed to the pretreatment system. The stripping solution is then returned to the tank, and the operation is continued.

Wastewater from the RotoFinish operation also discharges to the pretreatment system. Metal parts are deburred by the RotoFinish machines. The machines are doughnut-shaped devices with an outer compartment filled with pieces of abrasive material. Parts are placed in the compartment with the abrasive pieces, and then the machine vibrates. An alkaline cleaning solution is added to the compartment during the machine operation.

2.3.2 Spent Filters from Plating Operations (F006)

Paper filters coated with diatomaceous earth and activated carbon are used to screen particulates and organics out of nickel and chrome plating solutions. The filtering device is a

metal cylinder that holds about 22 paper filters. When the paper filters become too dirty to effectively remove the organics, they are placed in a drum (SWMUs 12 and 13) located next to the filtering devices. A small amount of lime is added to the spent filters being accumulated to neutralize the waste. Bags that serve as screens around the nickel chips in the electroplating baths are also deposited in the drum when they are no longer effective. When the drum is full, it is emptied into the roll-off box (SWMU 19) used to accumulate F006 waste from the pretreatment system.

The zinc plating line also has a filtering system (SWMUs 10 and 11). The tube filters used contain three bags. When the bags need to be replaced, they are allowed to dry over a pit connected to the pretreatment system (SWMUs 16, 18, and 19) and then collected in a drum. When the drum is full it is deposited in the roll-off box.

2.3.3 Paint Wastes (F003, D001)

Eureka can apply a high-solids, solvent-based paint to vacuum cleaner parts electrostatically in automatic paint booths or with hand-held spray guns. A solvent composed of methyl isobutyl ketone (MIBK) is used to flush the paint hoses and spray guns on a daily basis. Toluene was used as the cleaning solvent in the past. Spent solvent and paint are collected in small containers that are emptied into 55-gallon drums in metal cabinets near the spray booths (SWMU 27, 30, 31, 43, and 44). Full drums are taken to the container storage area.

Some vacuum cleaner parts are conveyed through a dip tank containing a water-based paint. When Eureka cleans the tank, wastes are pumped into drums which are stored in the container storage area (SWMU 48). Eureka is currently handling the water-reduced paint as hazardous waste, although analysis has revealed no hazardous characteristics. This waste is not mixed with any hazardous wastes. A waste analysis for this waste is included in Attachment E.

Eureka has a paint-stripping operation in which paint is removed from production items, paint hooks, and paint racks, and then accumulated in SWMU 38. A potassium hydroxide solution is used to remove the paint. This operation is conducted in Building 7 (formerly in Building 5). Reusable alkaline material is taken out of the decant tank and is placed in either the hook or rack paint-stripping tank. Material that settles to the bottom of the decant tank is drawn out and disposed of as hazardous waste (D002) in drums. This material is not mixed with any other waste. These drums are stored in the container storage area (SWMU 48) before treatment and disposal off-site. The material is called paint pigments in alkali. A waste analysis for this waste is included in Attachment E.

The rinse water from the stripping baths overflows to a supply tank that feeds the vacuum filter. The vacuum filter removes suspended solids. Sludge generated from the vacuum filter is called paint strip sludge. A waste analysis for this waste is included in Attachment E. Wastewater discharged from the vacuum filter goes on to be further treated at the parts washer wastewater treatment plant (SWMU 26) located in the west room of Building 4T. Paint strip sludge is accumulated in a "Gaylord Box" (a plastic-lined cardboard box) near the strip pad that is placed in the container storage area. The Gaylord Box is placed into a roll-off box (SWMU 47) and is sent to McLean County Landfill for disposal. This waste is neutralized as part of the treatment system and does not exhibit any hazardous characteristics.

Fiberglass paint filters are routinely removed from the dry booths as the filters become saturated with overspray. Chemical analyses of the spent filters have indicated that they are nonhazardous. A waste analysis for this waste is included in Attachment E. The spent filters are placed in a Gaylord Box that is placed into a roll-off box (SWMU 47). The are disposed of at the McLean County Landfill.

Dried paint on paint hooks and racks is "knocked off" before a part is stripped and collected in a drum (SWMU 31). The dried paint is collected along with paint overspray from the paint booths and is disposed of with the paint strip sludge.

2.3.4 Solvent Wastes (F001, F002)

Eureka once employed 1,1,1-trichloroethane (1,1,1-TCA) in a variety of processes. All use of this solvent has been discontinued. Previously, a small vapor degreaser with 1,1,1-TCA was used in the metal shop (Building 7) to clean oil, dirt, and grease off metal parts, thus generating and accumulating spent 1,1,1-TCA. The vapor degreaser held about 80 gallons of solvent. Waste solvent removed from the degreaser was stored in a drum on the east side of Building 7 (SWMU 3).

A small parts washer was also located in the eastern portion of Building 7. The parts washer held about 10 gallons of 1,1,1-TCA solvent. Waste solvent from the parts washer was collected in a drum kept next to the east central wall of Building 7 (SWMU 3).

The solvent, 1,1,1-TCA, was used to dissolve silicon rubber gaskets off parts (SWMU 40). The solvent was collected in a drum in the Plant 2 Wastewater Treatment Area.

The facility also received spent 1,1,1-TCA from Eureka's Normal facility. The Normal facility uses 1,1,1-TCA to clean resin off field coils and armatures and to clean trickle lines to

prevent clogging. This waste was manifested and sent to the Bloomington facility for storage in SWMU 48.

Spent Stoddard solvent is used in several areas of the facility. Several small safety containers of Stoddard solvent used to clean parts are accumulated in Building 7 (SWMU 7). The spent solvent is accumulated in a drum kept next to the east central wall of Building 7 (SWMU 7). Stoddard solvent is also used in a 25-gallon tank in the tool room (SWMUs 32 and 34) to remove grease and oil from metal parts. There are also other areas in the maintenance and machine shops where Stoddard solvent is used.

A small container of Stoddard solvent is located in the Mule Barn where forklifts are serviced in Building 3 (SWMU 33). About 5 gallons of spent Stoddard solvent is generated at this location every 6 months (SWMU 33). A drum of spent Stoddard solvent is located in a cabinet south of Building 3. This is the designated satellite accumulation point for spent solvent for Building 3 (SWMU 33).

Spent Stoddard solvent is also generated at the Normal facility from parts cleaning in its maintenance department. This spent solvent has been shipped to the Bloomington facility in the past. It was stored at the Bloomington facility until it could be transported to a recycler. This activity was discontinued in 1990.

2.3.5 Parts Washer Sludge

Prior to painting, some metal parts go through a parts washing process at the facility. Phosphoric acid is used to apply a surface coating to a part, allowing paint to adhere better. There are currently two parts washers that use phosphoric acid (SWMUs 28 and 34) and solution treatment centers (SWMUs 26 and 40) at the facility. Rinse waters and waste acid solution are sent to the treatment centers for neutralization and filtering before they are discharged to the BNWRD sewer system. Sludge collects on the paper cartridge filters during the treatment process which are then disposed of as nonhazardous waste.

The sludge generated in the treatment center in the northern portion of Building 1B is considered nonhazardous. Analysis has indicated that it does not exhibit hazardous waste characteristics.

2.3.6 Waste Oils

At the beginning of each nickel/chrome plating line is an alkaline bath used to remove oil and grease from parts prior to plating. The bath solution is regenerated by piping it to an adjacent centrifuge that separates oil and grease from the solution. The solution circulates back to its original tank. Oil and grease generated from the treatment is called tramp oil. A waste analysis for this waste is included in Attachment E. Tramp oil is collected in drums (SWMUs 14 and 15) and stored. Full drums are taken to the oil separator located in the west room of Building 4T (SWMU 40). Tramp oil is combined with scrap cimcool (a water-soluble coolant) and ferric chloride in the oil separator. Sulfuric acid then is added, and the contents are mixed. The oil layer is removed for recycling, the water layer is discharged to the BNWRD sewer system, and the sludge is drained into drums for off site disposal.

Straight oil (non-water-soluble) is used for various lubricating jobs at the facility. Some cutting and drawing machines apparently use lubricating oils, as do vehicle crankcases, machine gearboxes and hydraulic systems. Waste oil is generated when lubricating oils are replaced. Different waste oils are mixed and stored in 55-gallon drums in the container storage area (SWMU 48). Waste oil has also been received from Eureka's Normal facility in the past.

2.3.7 Wastes Generated by Eureka's Normal Facility

In the past, the Bloomington facility has accepted waste from Eureka's Normal facility. Because the Bloomington facility is closing its RCRA container storage area, this practice will be discontinued. Water-soluble resin is used at the Normal facility to make parts for vacuum cleaners. Both hardened scrap resin and resin in water have been manifested to the Bloomington facility in the past. The resin and water waste is generated from cleaning resin application equipment with water. The Bloomington facility had a treatment unit to evaporate water from the resin and water waste. The scrap resin was disposed of at McLean County Landfill.

Eureka's Normal facility also generates a food-grade adhesive waste. The adhesive is used to seal shipping boxes. In the past, empty drums that had held the adhesive were brought to the Bloomington facility where they were scraped out. The residue was accumulated in a waste drum that was eventually shipped off site (SWMU 48).

2.3.8 Oil Separator Wastes

Grinding machines used to work on metal parts generate a waste consisting of metal fines and a small amount of adhering cooling oil. Eureka has a centrifuge where the metal scraps are

spun to remove excess oil. The scrap oil is then accumulated in 55-gallon drums (SWMU 6) for treatment in the oil separator. Non-water-soluble scrap oil and tramp oil are also treated in the oil separator (SWMU 41). An oil-skimming belt removes the oil from the treatment tank. The remaining sludge is treated with lime, and absorbent material is added. Spent filters from the oil separator are accumulated in drums in the area before being stored in the container storage area (SWMU 48) before off-site treatment and disposal.

2.4 DOCUMENTED RELEASE HISTORY

On August 2, 1985, 25 gallons of trichrome additive was released from a drum inside the facility (IEPA, 1985a). The spill flowed under a door, off the facility, onto a playground, and into a tile drain. The tile drain was connected to a storm sewer that discharges into Sugar Creek about 2 miles from the Eureka facility. Blue precipitate from the spill was observed 1,000 to 1,500 feet downstream of the storm sewer outlet. About 22,000 gallons of contaminated water was removed from 500 feet of the creek and taken back to the Eureka facility to be treated in its water treatment system to remove the contamination. The facility also flushed the storm water system to remove any additional contaminants. Straw used to contain the precipitate was disposed of off site. The area where the spill occurred has now been trenched, and trichrome additive is no longer used at the facility. No other spills have been documented.

2.5 REGULATORY HISTORY

On September 5, 1978, Eureka submitted to IEPA an application for a permit to develop a solid waste management area (Eureka, 1980b). The application was for a transfer and storage area for drummed wastes. On August 13, 1980, the facility submitted a Notification of Hazardous Waste Activity as a generator; treatment, storage, or disposal (TSD) facility, and transporter of a wide variety of F, U, P, and D listed hazardous wastes (Eureka, 1980a). Many of these wastes were misclassified by the facility and accordingly do not appear on subsequent notifications. On November 18, 1980, the facility filed a RCRA Part A permit application for storage of 38,500 gallons of D001, D002, D003, D006, D007, F001, and F006 listed wastes in its (SWMU 45) container storage area (Eureka, 1980c). The permit application also listed 158,400 gallons per day of tank treatment (T01) of D006, D007, and F006 wastes (SWMU 16). IEPA granted a developmental permit (1980-41-DE) and an operational permit (1980-41-OP) to Eureka to develop and operate a special waste storage area on December 3, 1980 (IEPA, 1980a and 1980b). On March 12, 1985, the facility submitted a revised Part A permit application that added F002 listed waste and deleted D006 waste (Eureka, 1985b).

Violations of various IEPA and RCRA requirements found during inspections in 1985 resulted in issuance of Compliance Inquiry Letters on September 23, 1985 (IEPA, 1985c), and September 2, 1986 (IEPA, 1986d). Continuing violations led to a pre-enforcement conference on November 14, 1986; the violations were apparently resolved. On October 21, 1987, IEPA again sent Eureka a Compliance Inquiry Letter for apparent violations identified during an August 20 and 21, 1987, inspection (IEPA, 1987b). The apparent violations included nondetermination of waste streams as hazardous waste [35 Illinois Administrative Code (IAC) 722.111] and an inadequate waste analysis plan [35 IAC 725.113(b)]. A Notice of Violation regarding these violations was sent to Eureka on December 29, 1987 (IEPA, 1987c). The violations were apparently resolved by a January 18, 1988, response letter from Eureka (Eureka, 1988). A March 29, 1989, IEPA inspection discovered additional apparent violations involving unlabeled waste drums, an open roll-off container used to collect hazardous waste sludge, and accumulation of hazardous wastes in excess of 55 gallons in satellite accumulation areas (IEPA, 1989a). These violations were apparently resolved.

Eureka submitted a closure plan dated April 29, 1991, that was approved on June 25, 1991 (Eureka, 1991b). Closure activities must be completed by January 1, 1992, and must include decontamination and sampling of the container storage pad and surrounding area (SWMU 48). Eureka will begin using a new hazardous waste drum storage area (SWMU 9) for hazardous waste storage and will ship all wastes before the 90-day limit is reached.

IEPA granted a water pollution control permit (1984-EP-3004) to Eureka in 1984 to operate a water pollution control wastewater pretreatment system. This permit allowed discharges totaling 387,000 gallons per day (gpd) to the BNWRD system from three different outlets, which is regulated under permit BNWRD 91-02. The outlets are located at Maple Street, McClun Street, and the Shell Plant. Permit BNWRD 91-02 allows a total discharge of 255,000 gpd design average flow (DAF) and 365,000 gpd design maximum flow (DMF). Discharges are regularly monitored for various heavy metals, cyanide, pH, and biological parameters.

IEPA has issued permits for several facility waste streams, which are summarized in Table 2. Table 3 lists IEPA air emission permits held by the facility.

Eureka also has a National Pollutant Discharge Elimination System (NPDES) permit (IL0002771) that regulates three non-contact cooling water (003) and storm water (005 and 006) outfalls on Goose Creek. Discharges are monitored for flow, pH, temperature, biodegradable oxygen demand, and total suspended solids.

TABLE 3
CURRENT IEPA PERMITS FOR FACILITY AIR EMISSIONS

PERMIT NO.	EXPIRATION DATE	ITEM PERMITTED
74030104	03/27/95	Nickel, chrome strip line
74030119	01/11/95	Automatic plater No. 1
74030121	09/21/93	Annealing room--salt furnace and bake ovens
74030123	10/22/91	Wash, paint, bake line 131
74030125	05/15/95	Vapor degreaser
74030126	08/01/93	Five tool room grinders
74030130	10/22/91	Wash, paint, bake line 132
74030131	05/16/94	Three gas-fired boilers
74060129	06/30/92	Automatic plater No. 2
74060130	12/06/93	Two alkali strip tanks
74060131	07/25/93	Dust room, field engineering
75030071	07/25/93	Paint dip and parts washer
76080019	06/30/92	Automatic plater No. 3
77050045	01/09/96	Wax dip booth, dept. 21
81080043	01/31/92	Acid chloride zinc line
91020094	03/12/96	Derust tank and buffing jack
81080045	05/19/96	Two alkali strip tanks
81080046	02/05/92	Chrome destruct and treatment tanks
86010023	01/27/96	Sludge dryer, reducer

2.6 ENVIRONMENTAL SETTING

This section describes the climate, floodplain and surface water, geology and soils, and ground water in the vicinity of the Eureka facility.

2.6.1 Climate

The climate of McLean County is generally continental with hot summers and cold winters. The average temperature is 72.6°F in July and 35.8°F in February. The average annual precipitation is 35 inches, and the average annual evaporation rate is 32 inches. Winds are generally from the west at 8 to 10 miles per hour. The 1-year, 24-hour maximum rainfall value is 2.6 inches.

2.6.2 Floodplain and Surface Water

The facility is not located in a flood plain (FEMA, 1984). The only surface water within 2 miles includes some small ponds south of the facility and Sugar Creek about 1.5 miles north of the facility; Goose Creek, the point of discharge for the facility's NPDES outfalls, is about 2 miles south of the facility. These bodies of water are used for recreation. Bloomington and Normal receive their water supplies from Lake Bloomington (Money and Hickory Creeks) and Lake Evergreen (Six Mile Creek), which are located about 10 miles northeast and northwest of the facility, respectively.

2.6.3 Geology and Soils

McLean County topography and surface geology are results of the Illinois glacier and early Wisconsin-age glaciation. The average depth of glacial till over McLean County is 200 feet. Soils in the area are typically upland prairie soils composed of brown silt-loam (Hopkins, 1915). These soils are well drained. Well records for the area indicate topsoil over yellow clay to a depth of about 120 feet; this is underlain by alternating layers of sand and clay to 250 to 275 feet (Illinois State Water Survey, 1991).

The bedrock underlying the glacial till is Pennsylvanian shale containing thin beds of limestone, sandstone, and coal. (The shale may be water yielding, depending on the type of composition of the beds.)

2.6.4 Ground Water

A review of well records indicate that ground water in the area is found at a depth of 130 to 140 feet in sand and gravel lenses. These wells have been used for domestic and industrial purposes in the past. These wells are reportedly no longer used (Bloomington Water Department, 1991). The Bloomington water supply is drawn from surface water. Ground water flow direction is unknown (Illinois State Water Survey, 1991).

2.7 RECEPTORS

The facility is entirely fenced and is under 24-hour surveillance by security personnel. Records indicate several industrial and domestic water wells were discovered within 1/2 mile of the facility. Based on conversations with city water officials, this area is now supplied with city water and these wells are no longer believed to be in service. A similar situation applies throughout the 3-mile radius of the facility. All the wells were finished in sand and gravel aquifers at 130 to 140 feet with 120 feet of confining clay above. No surface water pathways exist near the facility except through the city sewer. The facility is located in a residential area. The population of Bloomington is approximately 50,000. Drinking water for the cities of Bloomington and Normal is drawn from surface water 10 miles from the facility. No sensitive environments were identified within three miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 48 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

Plant 1

SWMU 1 **Parts Washer with Oil Separator and DSAA**

Unit Description: This unit is located in the northwest corner of Building 7. A biodegradable solvent is used to remove oil from metal parts. An oil separator removes oil from the above solution, which is then collected in a 55-gallon drum (see Photograph No. 1). The rest of the solution is reused.

Date of Startup: This unit was put in operation in May 1990.

Date of Closure: This unit is currently operational.

Wastes Managed: *This unit manages nonhazardous waste oil removed from metal* parts. The solvent consists of approximately 5 percent RP-775 solution in tap water. The Material Safety Data Sheet (MSDS) for RP-775 is included in Attachment E.

Release Controls: This unit is located on concrete within the building.

History of Release: There have been no documented releases from this SWMU.

Observations: This unit was in operation at the time of the VSI. There was no visual evidence of release. The unit appeared to be in good condition. The facility stated that the drum is filled about every 3 months.

SWMU 2 **Alkaline Parts Washer and DSAA**

Unit Description: This unit is located at the north end of Building 7. The small parts washer uses the same solvent as SWMU 1 to remove oil from metal

	parts. A 2- to 3-gallon pail is used to collect waste oil removed from the parts (see Photograph No. 2).
Date of Startup:	This unit was put in operation in May 1990.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous waste oil removed from metal parts.
Release Controls:	This unit is located on concrete within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was in operation at the time of the VSI. There was no visual evidence of release. The unit appeared to be in good condition.
SWMU 3	**Old 1,1,1-TCA Vapor Degreaser**
Unit Description:	This unit was located in the northwest part of Building 7 just south of the present location of SWMU 1. The unit was formerly used to remove oil from metal parts (see Photograph No. 3). Waste solvent was accumulated in a 55-gallon drum and moved to SWMU 48 for storage and off-site disposal when full.
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit was closed in 1990.
Wastes Managed:	The unit manages nonhazardous waste oil removed from metal parts.
Release Controls:	This unit was located on concrete within the building.
History of Release:	There were no documented releases from this unit.

Observations:	This unit has been removed and was not viewed during the VSI. Presently, a sodium nitrate deburrer is located near the area of the unit. Crystals from the deburrer were observed on the floor around the area where the unit was located.
SWMU 4	**DSAA at Sodium Nitrate Deburrer**
Unit Description:	This unit is located in the northwest portion of Building 7 near the former location of SWMU 3. The deburrer is used to debur metal parts with sodium nitrate. When the deburrer is cleaned, the solution is removed, placed in drums, and moved to the wastewater treatment system.
Date of Startup:	This unit was put in operation in 1968.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages a solution of 5 to 10 percent sodium nitrate. The waste solution is disposed of in the wastewater treatment system.
Release Controls:	This unit is located on concrete within the building.
History of Release:	Crystals apparently from this unit were noted on the floor during the VSI. No other releases have been documented.
Observations:	This unit was in operation at the time of the VSI. A crystal substance was observed on the floor around the deburrer.
SWMU 5	**Scrap Coolant DSAA**
Unit Description:	This unit is a 55-gallon drum used to collect scrap coolant from processes conducted in the northern portion of Building 7. The waste is sent to the oil recovery system in Plant 2 (SWMU 41) (see Photograph No. 4).
Date of Startup:	This unit was put in operation in 1981.

Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit stores spent Stoddard solvent (D001) and nonhazardous waste oil.
Release Controls:	The drums are located on pallets over a concrete floor inside the building.
History of Release:	There have been no documented releases from this unit, although occasional small spills do occur.
Observations:	There were three covered drums present in this unit during the VSI. The drums were apparently being filled using a funnel. Some oil-dry was spread on the floor to capture a spill.

SWMU 8 **Steel Grinding Room Dust Collector**

Unit Description:	This unit is used to collect metal dust from various metal-working operations. The exhaust is vented to the outside air (see Photograph No. 7).
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages metal dust.
Release Controls:	This unit has a fabric filter to remove metal dust from vacuum exhaust.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was not being used at the time of the VSI, but it appeared to be in good condition.

SWMU 9	**New Hazardous Waste Container Storage Area**
Unit Description:	Eureka has purchased six cabinets to replace the hazardous waste container storage area (SWMU 48) and placed them outside the east wall of Building 7. Each cabinet can hold 10 drums and is self-contained (see Photograph No. 8).
Date of Startup:	Eureka will start to use this unit in late 1991 for less than 90 day storage.
Date of Closure:	This unit has not yet been used.
Wastes Managed:	This unit will manage hazardous waste from throughout the facility.
Release Controls:	Each cabinet is ventilated and can contain a 220-gallon spill. The cabinets are all located on asphalt.
History of Release:	There have been no releases from this unit. It has not yet been used.
Observations:	The cabinets were new. Eureka was waiting for fire extinguishers before using the cabinets.
SWMU 10	**Zinc Plating Area Sumps**
Unit Description:	The zinc barrel plating line is located in the east portion of Building 10. Sumps located below the tanks receive spill and overflow material, which is occasionally pumped to the wastewater treatment plant (SWMU 16). A cylindrical filter is located behind the plating tanks that removes sludge from the plating solutions (see Photographs No. 9 and 10). A description of this process is included in Attachment D.
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.

Wastes Managed:	This unit manages zinc and chromium waste plating solutions.
Release Controls:	The sump receives any spills or overflows from the area.
History of Release:	There have been no documented releases from this area.
Observations:	This unit was in operation at the time of the VSI and appeared to be in good condition. Ventilation is to the roof, without treatment.
SWMU 11	**Zinc Filter DSAA**
Unit Description:	Spent filters from the zinc plating operation are collected in a 55-gallon drum in the southeast portion of Building 6B. The waste is added to the sludge roll-off box (SWMU 19). A drum is filled about once every 4 months (see Photograph No. 11).
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages sludge from zinc plating solution. The waste is collected and disposed of with other electroplating wastewater sludges as hazardous waste (F006).
Release Controls:	This unit is located on a concrete floor within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	The drum was covered and appeared to be in good condition during the VSI.
SWMU 12	**Nickel/Chrome Plating Areas 1 and 2 SAA**
Unit Description:	This unit is made up of two nickel/chrome plating lines located in Building 6B. Overflow from the tanks is caught and pumped to the wastewater treatment plant. Spent filters on the nickel and chromium plating tanks are removed and collected in a 55-gallon

	drum next to the plating line. A description of the process is included in Attachment D (see Photograph No. 12).
Date of Startup:	Plating line 1 has been used since 1961. Plating line 2 has been used since 1973.
Date of Closure:	The unit is currently operational.
Wastes Managed:	This unit manages plating solution wastes and filter sludges (D007). A separate, multi-plate filter is used on the chrome plating bath and on the nickel plating bath on each plater. Each plate has a reusable polypropylene filter; a cellulose filter aid is added to improve filtering ability, and carbon is added to remove organic contaminants. When pressure in the filters builds to a set point, the plates are removed and the filtrate is scraped into a 55-gallon collection drum.
Release Controls:	The entire unit is located on concrete within the building. The unit is ventilated to the outside air. Spills from the plating tanks are collected and sent to the wastewater treatment plant (SWMU 16). The three sumps have capacities of 740 gallons (chrome), 314 gallons (nickel), and 1,200 gallons (acid and alkali).
History of Release:	There have been no documented releases from the areas included within this SWMU.
Observations:	This unit was in good condition during the VSI. Plating line 1 was the only one in operation. The drums were covered, and there was no visual evidence of release.
SWMU 13	**Nickel/Chrome Plating Area 3 SAA**
Unit Description:	See the SWMU 12 unit description. Plating line 3 is slightly larger than plating lines 1 and 2 (see Photograph No. 16).
Date of Startup:	This unit was put in operation in 1976.
Date of Closure:	This unit is currently operational.

Wastes Managed:	See the SWMU 12 wastes managed.
Release Controls:	This unit is located on concrete within the building. The three sumps have capacities of 800 gallons (chrome), 2,900 gallons (nickel), and 4,300 gallons (acid and alkali).
History of Release:	There have been no documented releases from this unit.
Observations:	This area appeared to be in good condition during the VSI. Drippings on the floor from metal parts were being collected with oil-dry. Facility representatives stated that the oil-dry was disposed of with oil separator sludge.
SWMU 14	**Tramp Oil in Alkali DSAA (Ni/Cr Lines 1 and 2)**
Unit Description:	A potassium hydroxide wash tank removes oil from metal parts before they are plated in Ni/Cr lines 1 and 2. The oil is removed from the alkaline solution by a centrifuge, and the waste, "tramp oil in alkali," is collected in a 55-gallon drum in this unit (see Photograph No. 13).
Date of Startup:	This unit was put in operation in 1972.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages tramp oil in alkali (waste oil removed from metal parts).
Release Controls:	This unit is located on concrete within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	The drum was covered during the VSI. There was no evidence of release.

SWMU 15	**Tramp Oil in Alkali DSAA (Ni/Cr Line 3)**
Unit Description:	See the SWMU 14 unit description (see Photograph No. 15).
Date of Startup:	This unit was put in operation in 1976.
Date of Closure:	This unit is currently operational.
Wastes Managed:	See the SWMU 14 wastes managed.
Release Controls:	This unit is located in a diked area on concrete within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	The collection drum was covered during the VSI. However, the drum was resting on top of the concrete ledge forming the containment dike.
SWMU 16	**Wastewater Treatment Plant**
Unit Description:	This unit handles liquid waste from plating operations and alkaline waste from rotofinish deburring operations. The unit is located in Building 6B. Its operation is discussed in Section 2.3. A process flow diagram is included in Attachment D. Treated water is discharged to the BNWRD sewer system. Sludge is sent to SWMU 18 (see Photograph No. 17).
Date of Startup:	This unit was put in operation in 1984.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages plating solutions containing various heavy metals (D007).
Release Controls:	This unit is located on concrete within the building. The discharge is monitored. Any release would flow to a nearby sanitary sewer and be treated by the BNWRD treatment plant.

History of Release: There have been no documented releases from this unit.

Observations: This unit was in operation during the VSI. No evidence of release was observed.

SWMU 17 **Nickel Solution Evaporation Unit**

Unit Description: Two rinse tanks are used to rinse excess nickel from metal parts after the plating process. The tanks are continuously emptied and replenished by a nickel recovery system. Rinse solutions are sent to the evaporation unit, where the nickel and water are separated. The nickel is returned to the plating solution and the water is returned to the rinse tanks (see Photograph No. 18). Material that cannot be recovered by this unit was being collected in a concrete secondary containment structure during the VSI.

Date of Startup: This unit was put in operation in 1980.

Date of Closure: This unit is currently operational.

Wastes Managed: This unit recycles used rinse solution containing nickel. Wastes from the evaporation unit were being collected on the surrounding concrete secondary containment structure during the VSI.

Release Controls: The unit is located on a concrete floor within the Building 6B, and the area is diked.

History of Release: There have been no documented releases from this unit.

Observations: Waste nickel solution was dripping from this unit during the VSI.

SWMU 18 **Sludge Drier and Dry Sludge Drum**

Unit Description: This unit is located in Building 6B. It removes liquid from sludge generated in the wastewater treatment tank. The sludge is accumulated in a 55-gallon drum and is then added to the sludge roll-off box. The liquid removed is returned to the wastewater treatment plant (see Photograph No. 19).

Date of Startup:	This unit was put in operation in 1984.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages plating sludge (F006) from the wastewater treatment plant.
Release Controls:	This unit is located on a concrete floor within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit appeared to be in good condition during the VSI.
SWMU 19	**Sludge Roll-off Box**
Unit Description:	The roll-off box located in Building 6C is used to collect plating sludge from the wastewater treatment plant (F006), chromium and nickel filters from the plating lines, and the zinc plating wastes (see Photograph No. 20).
Date of Startup:	This unit was put in operation in 1985.
Date of Closure:	This unit is currently operational.
Wastes Managed:	The roll-off box is used for temporary accumulation of plating sludges (F006) until they are shipped off site.
Release Controls:	This unit is located on a concrete floor within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was covered and appeared to be in good condition during the VSI.
SWMU 20	**Scrap Metal Trailer**
Unit Description:	This trailer is located in Building 6C near SWMU 19. The trailer is used to collect scrap metal generated throughout the facility in

	various operations. The metal is shipped off site to a recycler (see Photograph No. 21).
Date of Startup:	This unit was put in operation in 1988.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages scrap metal that is often covered with oil.
Release Controls:	This unit is located on concrete within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	During the VSI, oil dripping from the trailer was being absorbed with oil-dry.
SWMU 21	**Waste Oil Collection Area (Laser Cutting Machines)**
Unit Description:	This unit is a future SAA collection point for waste oil generated by machines used to form metal parts.
Date of Startup:	This unit will start being used in late 1991.
Date of Closure:	This unit is not yet in place.
Wastes Managed:	This unit will manage nonhazardous waste oil from metal parts formation.
Release Controls:	This unit will be located on concrete within Building 5.
History of Release:	No releases have occurred. This unit is only proposed.
Observations:	This unit was not viewed during the VSI. It is only proposed at this time.

SWMU 22	**Waste Oil DSAA (Building 6)**
Unit Description:	This unit contains a 55-gallon drum used to accumulate scrap oil and hydraulic fluid from punch presses located in Building 6. The waste oil is treated in the oil treatment system in Facility 2 (see Photograph No. 22).
Date of Startup:	This unit was put in operation in 1980.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages waste oil and hydraulic fluid.
Release Controls:	This unit is located on a concrete floor within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	The drum was covered and appeared to be in good condition during the VSI.
SWMU 23	**Nickel Strip Area**
Unit Description:	Improperly plated metal parts are stripped of their finish in this unit using sodium hydroxide. All wastewater is sent to the wastewater treatment plant (SWMU 16). This wastewater is collected in a sump beneath the strip tanks. Operation of the stripping operation is discussed in Attachment D (see Photograph No. 24).
Date of Startup:	This unit was put in operation in 1978.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nickel and chromium in solution that have been stripped from metal parts using sodium hydroxide.
Release Controls:	This unit is located on concrete within Building 6A. Spills and overflow from the stripping tank are collected in sumps and sent to the wastewater treatment plant.

History of Release:	There have been no documented releases from this unit.
Observations:	This unit was in operation during the VSI. No signs of release were observed.
SWMU 24	**Plastic Mold Injection SAA**
Unit Description:	Eureka uses General Electric Lexan and Cycolac plastics to form vacuum cleaner parts in Building 5. Waste oils from the plastic forming machines are collected in trays beneath the injection machines. A trench surrounds the area to prevent a release.
Date of Startup:	This unit was put in operation in 1988.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages waste oils from plastic mold injection machines. The trenches are drained as needed.
Release Controls:	The entire area of the unit is trenched. The injection machines are located on concrete and are located within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was clean and in good condition during the VSI.
SWMU 25	**Building 5 IPA Parts Washer SAA**
Unit Description:	The unit, an IPA parts washer, is located in Building 5. Sludges generated are collected in a 55-gallon drum next to the parts washing sink. The area is ventilated, and new IPA is added to the sink as old IPA evaporates (see Photograph No. 25).
Date of Startup:	This unit was put in operation in 1988.
Date of Closure:	This unit is currently operational.

Wastes Managed:	This unit manages nonhazardous paint sludges contaminated with IPA.
Release Controls:	This unit is located on concrete within the building. The area of the unit is ventilated.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was in good condition during the VSI. No evidence of release was observed. There was a noticeable odor of IPA in the area.

SWMU 26 **Parts Washer Wastewater Treatment Plant**

Unit Description:	A wastewater treatment plant located in Building 1B treats spent parts washer solution from the phosphoric acid parts washer in the painting area (SWMU 28) and the alkaline parts washer in Building 7 (SWMU 34). Wastewater enters a collection tank that overflows to a treatment tank. Solution pH is adjusted to a range of 7 to 8 with either a 10 percent caustic soda solution or a 10 percent sulfuric acid solution. After neutralization, the wastewater is sent to a filter supply tank. Wastewater is drawn from this tank through a cartridge filter. It can then be sent back to the filter supply tank to maintain wastewater volume for filters or discharge directly to the BNWRD system. Parts washer cleanouts are treated by the same process. Sludge and filter material is collected at the point of generation in a Gaylord box and is landfilled off site as nonhazardous neutralized sludge. A process flow diagram is included in Attachment D (see Photograph No. 26).
Date of Startup:	This unit was put in operation in 1975.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages spent phosphoric acid parts washer solution and spent alkaline parts washer solution.

Release Controls:	This unit is located on concrete within the building. Any release would be directed to the BNWRD sewer system.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit consists of the wastewater treatment system, the filters for the wastewater, and the Gaylord box. The unit was operating and was in good condition during the VSI.
SWMU 27	**Paint Mixing Room DSAA**
Unit Description:	This unit is used for mixing product paints before they are pumped into the spray booths. Wastes generated from cleaning the mixers and drums are collected in a 55-gallon drum (see Photograph No. 27).
Date of Startup:	This unit was put in operation in 1977.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages waste paint and spent solvent (D001 and F003).
Release Controls:	This unit is curbed with concrete. The unit is located within Building 1.
History of Release:	There have been no documented releases from this unit.
Observations:	The drum was covered and appeared to be in good condition during the VSI.
SWMU 28	**Phosphoric Acid Parts Washer SAA**
Unit Description:	This parts washer is a three-stage parts washer using phosphoric acid to clean parts before they are painted in the spray booths. This unit is located in Building 1. A similar unit is located in Building 5D (SWMU 34). Waste oil is skimmed from the cleaning solution and collected in a 55-gallon drum located next to the parts washer.

Date of Startup:	This unit was put in operation in 1977.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous waste oil from parts cleaned in the parts washer.
Release Controls:	The parts washer and collection drum are located on concrete within Building 1.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was operating and appeared to be in good condition at the time of the VSI.
SWMU 29	**Old Paint Solvent Storage Cabinet SAA**
Unit Description:	At one time, Eureka had a storage cabinet to contain a drum of waste paint and spent solvent from the spray booths. The cabinet is still located just north of Department 132 in Building 1 (see Photographs No. 28 and 29).
Date of Startup:	This unit was put in operation in 1978.
Date of Closure:	This unit has not been used since June 1991. The cabinet is still present outside the paint shop.
Wastes Managed:	This unit managed waste paint and spent solvent from the spray booths. Analytical results for the waste paint and solvent are included in Attachment E.
Release Controls:	This unit is a self-contained cabinet capable of storing one 55-gallon drum. Any spills would have been captured in the bottom of the cabinet.
History of Release:	There have been no documented releases from this unit.

Observations:	The unit was not in use during the VSI. Paint had been spilled all over the inside of the cabinet, but PRC observed no evidence of a release.
SWMU 30	**Paint Spray Room DSAA**
Unit Description:	The unit contains the drum used to collect spray booth waste paint and spent solvent. The drum, previously kept in SWMU 29, is now located in the spray booth area (see Photograph No. 30).
Date of Startup:	This unit was put in operation in June, 1991.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages waste paint and spent solvent from the spray booths (D001, F003).
Release Controls:	This unit is located in a concrete room that is curbed.
History of Release:	There have been no documented releases from this SWMU.
Observations:	The drum was covered and was being filled using a funnel at the time of the VSI.
SWMU 31	**Paint Chip Collection Drum**
Unit Description:	This unit is located at the northeast corner of the paint shop. It is used to collect dried paint chips that have been knocked off paint racks (see Photograph No. 31).
Date of Startup:	This unit was put in operation in 1978.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages dried paint chips that are disposed of with neutralized paint sludge.
Release Controls:	The unit is located on a concrete floor within Building 1A.

History of Release:	There have been no documented releases from this unit.
Observations:	The drum was on a pallet and was almost full at the time of the VSI. Paint chips had been spilled on the floor around the drum.
SWMU 32	**Stoddard Solvent Washer SAA**
Unit Description:	The unit contains three Stoddard solvent washers kept in the tool room (Building 3) to clean metal parts (see Photograph No. 32). Spent solvent is collected in trays beneath the washers.
Date of Startup:	This unit was put in operation in 1979.
Date of Closure:	These units are currently operational.
Wastes Managed:	Trays beneath the washers collect spent Stoddard solvent (D001), which is later transferred to drums. The washers generate about one drum of waste every 3 months.
Release Controls:	The trays are located on concrete.
History of Release:	There have been no documented releases from this unit.
Observations:	The one washer viewed during the VSI was in good condition. There was no evidence of release.
SWMU 33	**Forklift Waste Oil and Parts Cleaner SAA**
Unit Description:	Waste oil from forklift maintenance and a Stoddard solvent parts cleaner are located in the "mule barn" (Building 3). Waste oil and parts cleaner sludge are collected in 55-gallon drums (see Photographs No. 33 and 34).
Date of Startup:	This unit was put in operation in 1985.
Date of Closure:	This unit is currently operational.

Wastes Managed:	This unit manages Stoddard solvent sludge (D001) and nonhazardous waste oil.
Release Controls:	This unit is curbed, and the floor slopes to a sump that can be pumped out. The area of the unit is made of concrete.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit contained four drums of waste oil at the time of the VSI. Facility representatives stated that the parts cleaner was not used very often.
SWMU 34	**Phosphoric Acid Parts Washer (Building 5D) SAA**
Unit Description:	This parts washer is similar to the one in SWMU 28 (see Photograph No. 35) and oil is removed from the cleaning solution in the same manner as for SWMU 28..
Date of Startup:	This unit was put in operation in 1974.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous waste oil from parts cleaned in the parts washer.
Release Controls:	The parts washer is located on concrete.
History of Release:	There have been no documented releases from this unit.
Observations:	The unit appeared to be in good condition during the VSI.
SWMU 35	**Tool Room Stoddard Solvent and Waste Oil Collection Area**
Unit Description:	This unit is an accumulation area for wastes generated in the tool and maintenance rooms (see Photographs No. 36 and 37).
Date of Startup:	This unit was put in operation in 1978.
Date of Closure:	This unit is currently operational.

Wastes Managed:	This unit manages spent Stoddard solvent (D001) and nonhazardous waste oil.
Release Controls:	The spent Stoddard solvent is collected in a drum inside a cabinet similar to the one in SWMU 29. Drums are stored on concrete within the building.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was in good condition. Three drums of waste oil and one drum of spent Stoddard solvent were located in this unit during the VSI.
SWMU 36	**Chemistry Laboratory DSAA**
Unit Description:	Eureka has an on-site chemistry laboratory to analyze monitoring data and wastes generated. The unit is located on the second floor of Building 5A. The unit has a collection container for atomic absorption standards and samples, a container for plating tank waste samples, and a container for thinner and paint waste (see Photographs No. 49, 50, and 51).
Date of Startup:	Atomic absorption materials have been managed in this unit since 1978; the other materials have been managed here since 1988.
Date of Closure:	All three containers are currently being used to collect laboratory waste.
Wastes Managed:	All wastes generated at the facility are analyzed in this unit. Table 2 provides a complete list of these wastes.
Release Controls:	The unit is located on the second floor of Building 5A. The unit has a tile floor to contain any small spills that may occur in the laboratory.
History of Release:	There have been no documented releases from this SWMU.

Observations:	The laboratory was clean and orderly at the time of the VSI.
SWMU 37	**Paint and Solvents Storage Area**
Unit Description:	This unit is in Building 11, which is separate from the rest of the Plant 1 structure. The unit is used to store product paint and solvents (see Photograph No. 52). Because the area appeared to be subject to routine and systematic releases, the unit is considered a SWMU.
Date of Startup:	This unit was put in operation in 1971.
Date of Closure:	This unit is currently operational.
Wastes Managed:	No wastes are managed in this unit.
Release Controls:	The unit is curbed and has a concrete floor.
History of Release:	This unit has no documented history of release to the environment.
Observations:	At the time of the VSI, the floor of Building 11 was covered with paint that had leaked from drums and with dead pigeons. There was also a pervasive odor of solvent. Based on information provided by the facility, the pigeons were likely the victims of Eureka's pigeon abatement program (which is permitted) and not the paint and solvent in the building.

Plant 2

SWMU 38	**Paint Strip Tanks Waste Oil SAA**
Unit Description:	Paint is stripped from metal parts and paint racks using potassium hydroxide in four tanks. The tanks generate paint pigments in alkali, which is collected from the bottoms of the tanks and moved immediately to the container storage area (SWMU 48). Waste oil is also generated when metal parts are dipped in oil to prevent rusting. The waste oil is collected in a 55-gallon drum located near the strip tanks. A description of the process is included in Attachment D (see Photographs No. 38 and 39).
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous waste oil.
Release Controls:	This unit is located on concrete within Building 7T. The strip tanks are diked. Any waste reaching the diked area is pumped directly to the Facility 2 wastewater treatment plant.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was in operation during the VSI. Two recycling containers were also located in the area of the unit. The containers are no longer used.
SWMU 39	**Phosphoric Acid Derusting Area**
Unit Description:	In this unit, paint racks used in painting operations are derusted with phosphoric acid (see Photograph No. 40). Vapors are vented from this area through the roof untreated. Paint sludge is removed from this area and stored in a 55-gallon drum.
Date of Startup:	This unit was put in operation in 1986.

Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages spent phosphoric acid and evaporating product.
Release Controls:	The unit is ventilated. Plastic balls float on the surface of the phosphoric acid to prevent excess evaporation.
History of Release:	There have been no documented releases from this unit.
Observations:	The unit was not being used at the time of the VSI. The unit appeared to be in good condition. No evidence of release was observed.
SWMU 40	**Plant 2 Wastewater Treatment Plant**
Unit Description:	This unit pretreats paint strip wastewater before discharging it to the BNWRD. The wastewater is neutralized and filtered, generating neutralized paint sludge that is collected in a Gaylord box. The area of the unit was previously used as a 1,1,1-TCA strip area (see Photographs No. 41, 42 and 43).
Date of Startup:	This unit was put in operation in 1975.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous paint sludge and wastewater.
Release Controls:	The unit is located on concrete within Building 4T.
History of Release:	There have been no documented releases from this unit.
Observations:	This unit was in good condition during the VSI. No visual evidence of release was observed.
SWMU 41	**Oil Separator System**
Unit Description:	The oil separator system uses a batch treatment process. One 55-gallon drum of scrap cimcool oil, four 55-gallon drums of oil and

	water, and 1 gallon of ferric chloride flocculite polymer are mixed and brought to a pH of 1 using sulfuric acid. The batch is mixed again and allowed to separate. The oil is skimmed off, and the remaining water is neutralized to a pH of 7 using lime. One ounce of DuBois flocculite #551 is added, and the sludge is settled out. The remaining liquid is sent to the parts washer treatment system (SWMU 26). The sludge is collected and disposed of as nonhazardous waste. The oil is shipped off site for recycling (see Photograph No. 43).
Date of Startup:	This unit was put in operation in 1980.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous waste oils.
Release Controls:	The unit is located on concrete within Building 4T.
History of Release:	There have been no documented releases from this unit.
Observations:	The unit was operating and appeared to be in good condition during the VSI.
SWMU 42	**Oil Separator Drum Staging Area**
Unit Description:	This unit is located in a room adjacent to SWMU 41 in the southern part of Building 4T. The unit is used to store drums before their contents are added to the oil separator.
Date of Startup:	This unit was put in operation in 1980.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages nonhazardous waste oils.
Release Controls:	This unit is located on a concrete floor within the building.
History of Release:	There have been no documented releases from this unit.

Observations:	During the VSI, the unit contained six drums of waste oil waiting to be processed. There was no evidence of release from the unit.
SWMU 43	**Old Paint Mixing Room DSAA**
Unit Description:	A drum was previously kept in the Plant 2 mixing room in Building 2T to collect waste paints and solvents. This unit is not currently being used, and the drum has been removed.
Date of Startup:	This unit was put in operation in 1972.
Date of Closure:	This unit was closed in 1990.
Wastes Managed:	This unit managed waste paint and spent solvent from the mixing process.
Release Controls:	The mixing room is curbed and lined with a concrete floor.
History of Release:	There have been no documented releases from this unit.
Observations:	The mixing room was empty at the time of the VSI.
SWMU 44	**Old Paint Spray Room Waste Cabinet**
Unit Description:	This unit is a cabinet similar to SWMU 29. The cabinet was previously used to store waste paint and spent solvent from the spray booths in Plant 2 (see Photograph No. 44).
Date of Startup:	This unit was put in operation in 1978.
Date of Closure:	This unit was closed in 1990.
Wastes Managed:	This unit managed waste paint and spent solvent from spray booths (D001, F003).

Release Controls:	The room where the unit is located has a concrete floor. The unit is located within Building 2T. No waste is currently being collected in this unit.
History of Release:	There have been no documented releases from this unit.
Observations:	The cabinet was empty at the time of the VSI.
SWMU 45	**Plastic Injection Molding Area Waste Oil and Solvent DSAA**
Unit Description:	This unit is a container storage area for waste oils and spent Stoddard solvent generated in the molding area and machine shop in Building 5T (see Photograph No. 45).
Date of Startup:	This unit was put in operation in 1977.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages spent Stoddard solvent (D001) and nonhazardous waste oil.
Release Controls:	The unit is located on a concrete floor within Building 5T. The area of the unit is trenched.
History of Release:	There have been no documented releases from this unit.
Observations:	At the time of the VSI, two 55-gallon drums of scrap oil and one 55-gallon drum of Stoddard solvent were in the unit.
SWMU 46	**Plastic Injection Molding Area Parts Washer and Dried Paint Collection DSAA**
Unit Description:	This SWMU consists of an IPA parts washer and a 55-gallon collection drum for dried paint generated by the maintenance shop (see Photograph No. 46).
Date of Startup:	This unit was put in operation in 1981.

Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages IPA sludge and nonhazardous waste paint.
Release Controls:	The unit is located on a concrete floor within Building 5T.
History of Release:	There have been no documented releases from this unit.
Observations:	The floor around the parts washer and collection drum was covered with paint chips and small spills.
SWMU 47	**Nonhazardous Waste Roll-off Box**
Unit Description:	The roll-off box is used to collect nonhazardous wastes generated at the facility. These wastes are disposed of in a local landfill (see Photograph No. 47).
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages neutralized paint sludge, paint pigments in alkali, and other paint-associated nonhazardous wastes.
Release Controls:	The roll-off box is located on an asphalt parking lot.
History of Release:	There have been no documented releases from this unit.
Observations:	During the VSI, the roll-off box appeared to be in good condition. The asphalt around the box was cracked, and a full Gaylord box of waste was waiting to be added to the roll-off box.
SWMU 48	**RCRA Container Storage Area**
Unit Description:	This unit is Eureka's container storage area identified on their Part A. It is used to store hazardous and nonhazardous wastes. Drummed wastes are stored on the concrete floor. The container storage area has walls on three sides and is covered by a canopy.

	The unit consists of eight bays. The bay floors are sloped into a diked asphalt area. The four bays that store liquid wastes contain trenches to capture any spilled waste. The unit was storing about 60 drums of waste during the VSI. The facility has an approved closure plan for this area. Closure will include decontamination and sampling (see Photograph No. 48).
Date of Startup:	This unit was put in operation in 1981.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages hazardous and nonhazardous liquid wastes. These include paint wastes mixed with spent solvents, Stoddard solvent wastes, and waste oils.
Release Controls:	The area is covered with asphalt or concrete and is sloped to the southwest. The entire area is curbed, and hazardous wastes are stored in trenched bays. No release controls were in place before 1985.
History of Release:	There have been no documented releases from this unit. The area was covered with asphalt in 1985. Previously the area was covered with gravel.
Observations:	During the VSI, the unit was in good condition. No evidence of release was observed. Eureka is removing all the waste from this unit so that the container storage area can be closed.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 48 SWMUs at the Eureka facility. No AOCs were identified. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 4 identifies the SWMUs at the Eureka facility and suggested further actions.

SWMUs 1, 2, 4, 5, 6, 7, 11, 14, 15, 21, 22, 23, 24, 25, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 38, 39, 41, 42, 43, 44, 45, and 46 — **Satellite Accumulation Areas**

Conclusions:

All these SWMUs are satellite accumulation areas for various hazardous and nonhazardous wastes generated throughout both facilities. There have been no documented releases from any of these SWMUs. All are located on concrete floors within buildings. The potential for release from these units is similar. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release from any of these SWMUs via the ground-water route is low. Containment within buildings on concrete floors would prevent any spills from reaching an area where hazardous constituents could migrate to ground water.

Surface Water: The potential for release from any of these SWMUs via the surface water route is low. Containment within buildings on concrete floors and lack of a nearby surface water body limit the possibility of hazardous constituents being released via this pathway.

Air: The potential for release from any of these SWMUs via the air route is low. All the SWMUs are located in buildings where potential releases could be contained. Many of the SWMUs handle wastes that would pose a threat of air emissions only if a fire occurred.

TABLE 4
SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
Plant 1			
1. Parts Washer with Oil Separator and DSAA	May 1990 to present	None	No further action
2. Alkaline Parts Washer and DSAA	May 1990 to present	None	No further action
3. Old 1,1,1-TCA Vapor Degreaser	1981 to 1990	None	No further action
4. DSAA	1968 to present	Crystalline substance on floor	No further action
5. DSAA	1981 to present	None	No further action
6. Oil Recovery Centrifuge	1981 to present	None	No further action
7. Waste Oil and Stoddard solvent Waste Accumulation Area	1981 to present	None	No further action
8. Steel Grinding Room Dust Collector	1981 to present	None	No further action
9. New Hazardous Waste Container Storage Area	Will begin in late 1991	None	No further action
10. Zinc Plating Area	1981 to present	None	No further action
11. Zinc Filter DSAA	1981 to present	None	No further action
12. Nickel/Chrome Plating Area 1 and 2	1961 to present(1) 1973 to present(2)	None	No further action
13. Nickel/Chrome Plating Area 3	1976 to present	Oil-dry used to catch drippings from plating racks	No further action

TABLE 4 (Continued)
SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
14. Tramp Oil in Alkali DSAA (Ni/Cr Lines 1 and 2)	1972 to present	None	No further action
15. Tramp Oil in Alkali DSAA (Ni/Cr) Line 3	1976 to present	None	Place 55-gallon drum in the diking provided.
16. Wastewater Treatment Plant	1984 to present	None	No further action
17. Nickel Solution Evaporation Unit	1980 to present	Waste solution dripping from the column on to the concrete floor	Fix the leak.
18. Sludge Drier and Dry Sludge Drum	1984 to present	None	No further action
19. Sludge Roll-off Box	1985 to present	None	No further action
20. Scrap Metal Trailer	1988 to present	None	No further action
21. Waste Oil Collection Area (Laser Cutting Machines)	Will begin late 1991	None	No further action
22. Waste Oil DSAA (Building 6)	1980 to present	None	No further action
23. Nickel Strip Area	1978 to present	None	No further action
24. Plastic Mold Injection Containment System	1988 to present	None	No further action
25. Building 5 IPA Parts Washer DSAA	1988 to present	None	No further action

Sludges and other wastes generated by these units are properly handled and are disposed of off site according to their content. The potential for release to specific environmental pathways is summarized below.

Ground Water: These units pose a similarly low threat of release to ground water. All are located on concrete floors where small spills could be contained. The possibility of a large release from any of these units is remote.

Surface Water: These units pose a low threat of release to surface water. Discharges from these units are sent to the BNWRD system for further treatment. No surface water is present near the facility.

Air: The potential for release via the air route is low. The units are not ventilated and do not treat volatile wastes. All the units are located within facility buildings.

On-site Soils: The potential for release via the on-site soils route is low. All the units are located on concrete floors, and the possibility of a large release is remote.

Recommendations: No further action is recommended.

SWMU 19 **Sludge Roll-off Box**

Conclusions: The roll-off box is used to store plating waste sludges before they are shipped off site. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release from this unit to ground water is low. The dried sludge could easily be contained should a spill from the box occur. The box is located on concrete within a building.

Surface Water: The potential for release from this unit to surface water is low. The dried sludge could easily be contained should a spill from the box occur. The box is located on concrete within a building.

Air: The potential for release from this unit to air is low because it is covered, it is located within a building, and it does not handle wastes that can migrate to air.

On-site Soils: The potential for release from this unit to on-site soils is low. The dried sludge could easily be contained should a spill from the box occur. The box is located on concrete within a building.

Recommendations: No further action is recommended.

SWMU 20 **Scrap Metal Trailer**

Conclusions: This unit is used to store scrap metal before the metal is being shipped off site. During the VSI, PRC observed waste oil dripping onto the concrete floor from the trailer. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release to ground water is low. The amount of waste oil in the trailer is small and can be easily collected from the concrete floor below the trailer. The scrap metal is nonhazardous and is sent off-site for recycling.

Surface Water: The potential for release to surface water is low. The amount of waste oil in the trailer is small and can be easily collected from the concrete floor below the trailer. The scrap metal is nonhazardous and is sent off site for recycling.

Air: The potential for release to air is low. This unit is located within a building.

On-site Soils: The potential for release to on-site soils is low. The trailer is located on a concrete floor.

Recommendations: No further action is recommended.

SWMU 37 **Paint and Solvents Storage Area**

Conclusions: This unit is a product storage area. PRC observed that it was covered with spills during the VSI. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release to ground water is low to moderate. All spills were contained within Building 11 during the VSI. A release from the building would have to cross a large asphalt parking lot before it could reach a route to ground water.

Surface Water: The potential for release to surface water is low. A release from the building, if not cleaned up first, would be directed to storm sewers. The outlet of the storm sewers is 2 miles north of the facility, and a spill would probably be remedied by the time it reached this outlet.

Air: The potential for release to air is high. At the time of the VSI, the drums in the unit had been leaking and there was a noticeable odor of solvent outside Building 11.

On-site Soils: The potential for release to on-site soils is low. The facility grounds are covered by asphalt paving. This limits the potential for a release to reach surface soils.

Recommendations: This unit should be cleaned regularly, and the facility should prevent future releases of paints and solvents from the product drums.

SWMU 47 **Nonhazardous Waste Roll-off Box**

Conclusions: This box is used to store nonhazardous wastes before they are shipped off site. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release to ground water is low. The box is self-contained and is located on asphalt. Any wastes released from the box would be directed to the storm water drains in the parking lot.

TABLE 4 (Continued)
SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
26. Parts Washer Wastewater Treatment Plant	1975 to present	None	No further action
27. Paint Mixing Room DSAA	1977 to present	None	No further action
28. Phosphoric Acid Parts Washer	1977 to present	None	No further action
29. Old Paint Solvent Storage Cabinet	1978 to present	None	No further action
30. Paint Spray Room DSAA	June 1991 to present	None	No further action
31. Paint Chip Collection Drum	1978 to present	Paint chips on the concrete floor around the drum	No further action
32. Stoddard Solvent Washers	1979 to present	None	No further action
33. Forklift Waste Oil Collection Area and Parts Cleaner	1985 to present	None	No further action
34. Parts Washer and Oil Skimmer (Building 5D)	1974 to present	None	No further action
35. Tool Room Stoddard Solvent and Waste Oil Collection Area	1978 to present	None	No further action
36. Chemistry Laboratory DSAA	1978 to present	None	No further action
37. Paint and Solvents Storage Area	1971 to present	Paint and solvent on floor of Building 11	Clean area and take actions to prevent future leaks.
38. Paint Strip Tanks	1981 to present	None	No further action

TABLE 4 (Continued)
SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
39. Phosphoric Acid Derusting Area	1986 to present	None	No further action
40. Facility 2 Wastewater Treatment Plant	1975 to present	None	No further action
41. Oil Separator System	1980 to present	None	No further action
42. Oil Separator Drum Staging Area	1980 to present	None	No further action
43. Old Paint Mixing Room DSAA	1972 to 1990	None	No further action
44. Old Paint Spray Room Waste Cabinet	1978 to 1990	None	No further action
45. Plastic Injection Molding Area Waste Oil and Solvent DSAA	1977 to present	None	No further action
46. Plastic Injection Molding Area Parts Washer and Dried Paint Collection Drum	1981 to present	None	No further action
47. Nonhazardous Waste Roll-off Box	1981 to present	None	No further action
48. RCRA Container Storage Area	1981 to present	None	No further action unless closure activities determine that a release to surface soils has occurred

On-site Soils: The potential for release from any of these SWMUs via the on-site soils route is low. No releases have ever occurred. The SWMUs are located on concrete floors within buildings, limiting the possibility of release via this route.

Recommendations: No further action is recommended.

SWMU 3 **Old 1,1,1-TCA Vapor Degreaser**

Conclusions: This unit has been removed from the facility. The 1,1,1-TCA is no longer being used at the facility, and no releases from this unit were ever recorded. This unit poses no threat of release via any of the environmental pathways.

Recommendations: No further action is recommended.

SWMU 8 **Steel Grinding Room Dust Collector**

Conclusions: This unit does not handle hazardous wastes, and the dust is collected before the exhaust is emitted to the atmosphere. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release from this unit via the ground-water route is low. The SWMU does not handle hazardous wastes.

Surface Water: The potential for release from this unit via the surface water route is low. The SWMU does not handle hazardous wastes.

Air: The potential for release from this unit via the air route is low. Dust is collected by a fabric filter before exhaust is emitted to the atmosphere. This unit does not handle hazardous wastes.

On-site Soils: The potential for release from this unit via the on-site soil route is low. This SWMU does not handle hazardous waste.

Recommendations: No further action is recommended.

SWMU 9 — **New Hazardous Waste Container storage area**

Conclusions: This unit has not yet been used. It currently poses no threat of release via any of the environmental pathways.

Recommendations: No further action is recommended.

SWMUs 10, 12, and 13 — **Plating Areas**

Conclusions: These units have similar collection systems for the wastes they generate. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release from these areas via the ground-water route is low. The areas are located on concrete, and the contents of their collection pans can be sumped to the wastewater treatment plant for extra secondary containment.

Surface Water: The potential for release from these areas via the surface water route is low. The areas are located within buildings, and the possibility of a large release (more than a few of the plating tanks leaking at one time) is remote. No surface water is present near the facility.

Air: The potential for release from these areas via the air route is low. Vapors from the plating tanks are discharged without treatment to the atmosphere, and these discharges are permitted by IEPA. Only small amounts of hazardous metals are believed to be present in the emissions.

On-site Soils: The potential for release from these areas via the on-site soils route is low. The areas are located on concrete within buildings.

Recommendations: No further action is recommended.

SWMUs 16, 17, 18, 26, and 40 — **Waste Treatment Areas**

Conclusions: These SWMUs all treat wastes generated by processes at the facility. Where there are discharges, they are monitored; all discharges are to the BNWRD system, where they would be treated further if a release occurred.

Surface Water: The potential for release to surface water is low. The box is self-contained and is located on asphalt. The unit manages only solid wastes; these would have to travel through 2 miles of storm sewer before they could be discharged to surface water.

Air: The potential for release to air is low. The wastes handled by this unit are solid and nonvolatile. The box is self-contained.

On-site Soils: The potential for release to on-site soils is low. The facility grounds are covered by asphalt. This limits the potential for a release to reach surface soils.

Recommendations: No further action is recommended.

SWMU 48 **RCRA Container Storage Area**

Conclusions: This unit is used to store hazardous and nonhazardous liquid wastes. Eureka is in the process of closing this unit. The potential for release to specific environmental pathways is summarized below.

Ground Water: The potential for release to ground water is low. No documented releases occurred before the entire area was covered with asphalt; spills can be readily collected.

Surface Water: The potential for release to surface water is low. Spills leaving the storage bays would be diverted to the southwestern part of the pad so they could be easily collected.

Air: The potential for release to air is low. The unit is located outside, but the drums are kept closed.

On-site Soils: The potential for release to on-site soils is low. Any spills leaving the storage bays would be directed to a collection area. The entire unit is covered by concrete or asphalt.

Recommendations: Any releases from this unit that may have occurred will be addressed during closure. No further action is recommended at this time.

REFERENCES

Bloomington Normal Water Reclamation District (BNWRD), 1991. General Industrial Discharge Permit, BNWRD 91-02, January.

Eureka Company, 1980a. Application for Permit to Develop a Solid Waste Management Site, June 24.

Eureka Company (Eureka), 1980b. Notification of Hazardous Waste Activity, EPA Form 8700-12, August 13.

Eureka, 1980c. Part A Permit Application, November 18.

Eureka Permit, 1985a. Letter from Don Jenkins to EPA with Revised Part A Permit Application, March 12.

Eureka, 1985b. Letter from Don Jenkins to EPA Regarding Revised Part A Permit Application, April 15.

Eureka, 1985c. Letter from Jennie Pike to EPA Regarding August 2 Spill, August 14.

Eureka, 1986a. Certification Regarding Potential Releases from SWMUs for August 2, 1985, spill, February 11.

Eureka, 1986b. Letter from Don Jenkins to Richard Johnson, IEPA, Regarding Water Pollution Control Permit (Pretreatment), August 29.

Eureka, 1988. Letter from Don Jenkins to EPA Regarding Notice of Violation, January 18.

Eureka, 1989a. Plant 2 Evacuation Route Map, January 8.

Eureka, 1989b. Plant 1 Evacuation Route Map, May 18.

Eureka, 1991a. Letter from Don Jenkins to John Justice, IEPA, Regarding Air Variance, January 4.

Eureka, 1991b. Closure Plan, April 29.

Federal Emergency Management Agency (FEMA), 1984. Flood Insurance Rate Map for the City of Bloomington, Illinois, April 3.

Hopkins, Cyril, 1915. Soils Report No. 10, McLean County Soils, October 1.

Illinois Environmental Protection Agency (IEPA), 1979a. Memorandum from Glen Savage, Division of Land Pollution Control (DLPC), Regarding Pre-Developmental Inspection of Eureka Company Storage Site, September 27.

IEPA, 1979b. Letter from Sallie Smith, DLPC, to William Garmer, Eureka, Regarding Application for Permit to Develop a Solid Waste Management Site, October 17.

IEPA, 1980a. Division of Air Pollution Control (DAPC) Operating Permit, February 7.

IEPA, 1980b. Letter from Thomas Cavanagh to Harold Schaefer, Eureka, Regarding a Permit to Develop a Special Waste Storage Site, December 3.

IEPA, 1980c. Memorandum from Lynn Grills, DLPC, Regarding Inspection of the Eureka Site, December 30.

IEPA, 1981a. Letter from Thomas Cavanagh, DPLC, to Harold Schaefer, Eureka, Regarding Permit to Operate a Special Waste Storage Site, January 15.

IEPA, 1981b. DPLC Observation Report, January 21.

IEPA, 1981c. DPLC Inspection Report, June 19.

IEPA, 1982a. DLPC Observation Report, January 26.

IEPA, 1982b. DLPC Inspection Report, February 16.

IEPA, 1982c. Letter from Thomas Cavanagh, DLPC, to Don Jenkins, Eureka, Regarding Supplemental Permit to Modify the Special Waste Storage Area, May 19.

IEPA, 1982d. DPLC Observation Report, September 9.

IEPA, 1982e. DLPC Inspection Report, October 8.

IEPA, 1984a. Water Pollution Control Permit, February 9.

IEPA, 1984b. DLPC Observation Report, May 31.

IEPA, 1984c. Compliance Inquiry Letter from Glenn Savage, DLPC, to Don Jenkins, Eureka, Regarding May 31 Inspection, August 17.

IEPA, 1984d. RCRA Inspection Report Interim Status Standards for Transport/Storage/Disposal (TSD), December 21.

IEPA, 1985a. Emergency Response Unit Incident Control Sheet, Eureka, August 2.

IEPA, 1985b. Letter from Lawrence Eastep, DLPC, Regarding Modification of Supplemental Permit, August 7.

IEPA, 1985c. Letter from Mark Haney, DLPC, to Don Jenkins, Eureka, Regarding Permit Violations, September 23.

IEPA, 1986a. Letter from Thomas McSwiggin, DWPC, to National Union Electric Corporation regarding Final National Pollutant Discharge Elimination System (NPDES) Permit, March 12.

IEPA, 1986b. Letter from Robert Kuykendall, DLPC, to Don Jenkins, Eureka, Regarding Underground Storage Tank (UST) Regulations, April 4.

IEPA, 1986c. RCRA Inspection Report Interim Status Standards (TSD), June 26.

IEPA, 1986d. Compliance Inquiry Letter from Mark Haney, DLPC, to Don Jenkins, Eureka, Regarding Inspection Violations, September 2.

IEPA, 1986e. Pre-Enforcement Conference Letter from Michael Nechvatal, DLPC, to Don Jenkins, Eureka, Regarding Inspection Violations, October 28.

IEPA, 1986f. Letter from Harry Chappel, DLPC, to Don Jenkins, Eureka, Regarding Apparent Violations, October 28.

IEPA, 1986g. Water Pollution Control Permit, December 22.

IEPA, 1987a. DLPC Inspection Report Including Land Disposal Restriction (LDR) Checklist, August 20.

IEPA, 1987b. Compliance Inquiry Letter from Harry Chappel, DLPC, to Don Jenkins, Eureka, Regarding Violations Identified During August 20 and 21, 1987, Inspection, October 21.

IEPA, 1987c. Pre-Enforcement Conference Letter to Don Jenkins, Eureka, Regarding Apparent Violations, December 17.

IEPA, 1989a. DLPC Inspection Report, March 28.

IEPA, 1989b. Compliance Inquiry Letter from Angela Aye Tin, DLPC, to Don Jenkins, Eureka, May 2.

IEPA, 1989c. Memorandum Regarding Cooling Tower Water Additives, May 30.

IEPA, 1989d. DLPC Memorandum Regarding Enforcement Action for Violations at the Eureka Facility, July 25.

IEPA, 1989e. Letter from Lawrence Eastep, DLPC, to National Union Electric Corporation Regarding Application for Supplemental Permit to Modify Solid Waste Management (SWM) Site, September 20.

IEPA, 1991. Letter from Lawrence Eastep, DLPC, to Don Jenkins, Eureka, Regarding Closure Plan Approval, April 29.

Illinois Pollution Control Board, 1990. Provisional Variance for Storage of Hazardous Wastes for More Than 90 Days, August 9.

Illinois State Water Survey, 1991. Current Well Records for T23N, R2E, Section 10, of McLean County, July 16.

U.S. Environmental Protection Agency (EPA), 1981. Letter from Arnold Leder, Waste and Hazardous Materials Enforcement Branch, to Don Jenkins, Eureka, Regarding June 19, 1981, inspection, December 1.

EPA, 1982. Letter from Karl Klepitsch, Waste Management Branch, to Kenneth Winchester, Eureka, Regarding Interim Status, April 27.

EPA, 1985a. Conversation Record between Ann Brash, EPA, and Don Jenkins, Eureka, Regarding Part A Permit Application Revisions, May 16.

EPA, 1985b. Letter from Edith Ardiente, EPA, to Don Jenkins, Eureka, Regarding Part A Permit Revisions, June 14.

EPA, 1987. Notice of Violation from William E. Muno, EPA, to Don Jenkins, Eureka, December 29.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION
01 STATE: IL | 02 SITE NUMBER: ILD 001163823

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
The Eureka Company	1201 East Bell Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Bloomington	IL	61701	McLean		
09 COORDINATES: LATITUDE 40° 28' 12" | LONGITUDE 88° 58' 37"					

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
From Interstate 55, take State Route 9 East to U.S. Highway 150. Follow U.S. 150 to Bell Street. Turn left on Bell Street.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
National Union Electric Corporation	1201 East Bell Street		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Bloomington	IL	61701	(309) 828-2367
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Same as above.			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
			( )

13 TYPE OF OWNERSHIP *(Check one)*
☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☒ A. RCRA 3001 DATE RECEIVED: 8 / 13 / 80 *(MONTH DAY YEAR)* ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___ / ___ / ___ *(MONTH DAY YEAR)* ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 07 / 17 / 91
☐ NO

BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*
☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
1958 | Present (BEGINNING YEAR | ENDING YEAR)
☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Methyl ethyl ketone; paint wastes; waste oils; zinc, chromium, and nickel plating sludges.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

No potential hazard identified. No releases documented. Wastes handled in secure areas.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*
☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA Region 5	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Timothy S. Oliver		PRC EMI	(312) 856-8700	07 / 17 / 91 *(MONTH DAY YEAR)*

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 001163823

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☒ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

- TON _____
- CUBIC YARDS 20
- NO. OF DRUMS 80

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☒ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☒ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☒ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	20	cubic yards	Electroplating sludge
OLW	OILY WASTE	40	drums	Waste oils
SOL	SOLVENTS	20	drums	Paint solvents
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	20	drums	Other paint wastes
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SLU	Chromium	7440-47-3	20-cubic-yard roll-off box	unknown	
SLU	Nickel	7440-04-0			

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

EPA Region 5 Files / IEPA Files

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 001163823

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

No possible releases or poor containment.

01 ☒ B. SURFACE WATER CONTAMINATION — 02 ☒ OBSERVED (DATE: 1985) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 50,000

04 NARRATIVE DESCRIPTION

Release of "trichrome additive" flowed into storm sewer to Sugar Creek. The spill was cleaned up, and no other spill has occurred.

01 ☒ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: ____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

Inspectors noted solvent odor in parking lot on 7/17/91. The facility does not have any type of air treatment operations.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

None.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

None. Facility is fenced and patrolled 24 hours a day.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: ____ *(Acres)*

04 NARRATIVE DESCRIPTION

None.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

None.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

None.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: ____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ____

04 NARRATIVE DESCRIPTION

None.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 001163823

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 ☒ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☒ OBSERVED (DATE: 1985) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

See surface water contamination (item B above).

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — 02 ☒ OBSERVED (DATE: 1985) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

See surface water contamination (item B above).

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

Inadequate storage of product paint and solvents has resulted in systematic releases to floor of Building 11.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 50,000

IV. COMMENTS

Currently, only release of solvents into the atmosphere in this residential neighborhood is of concern.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

EPA Region 5 Files / IEPA Files

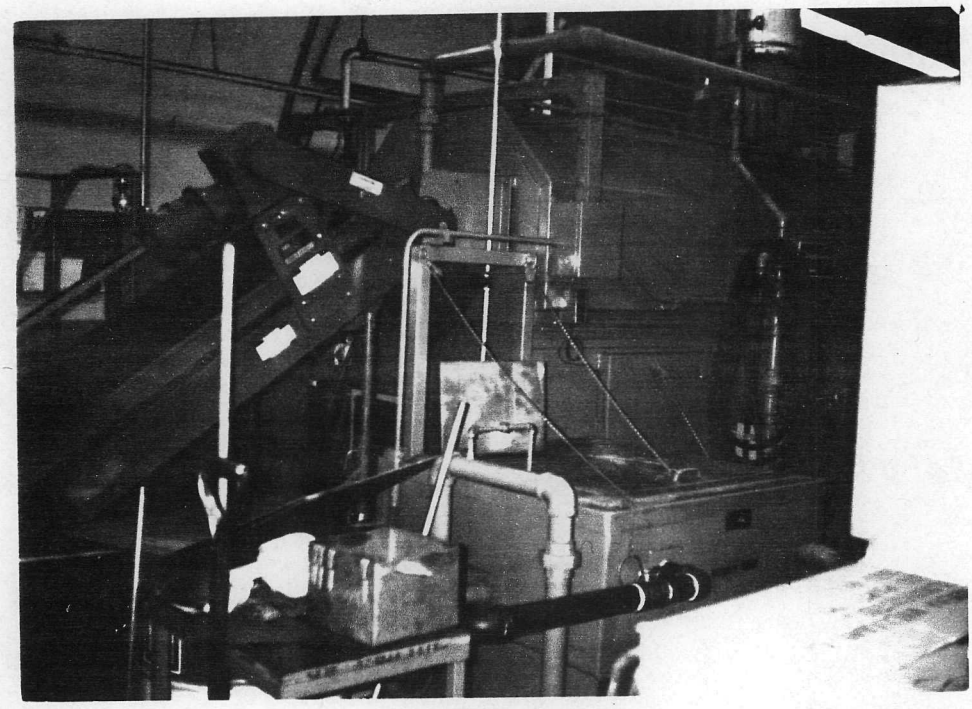
ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

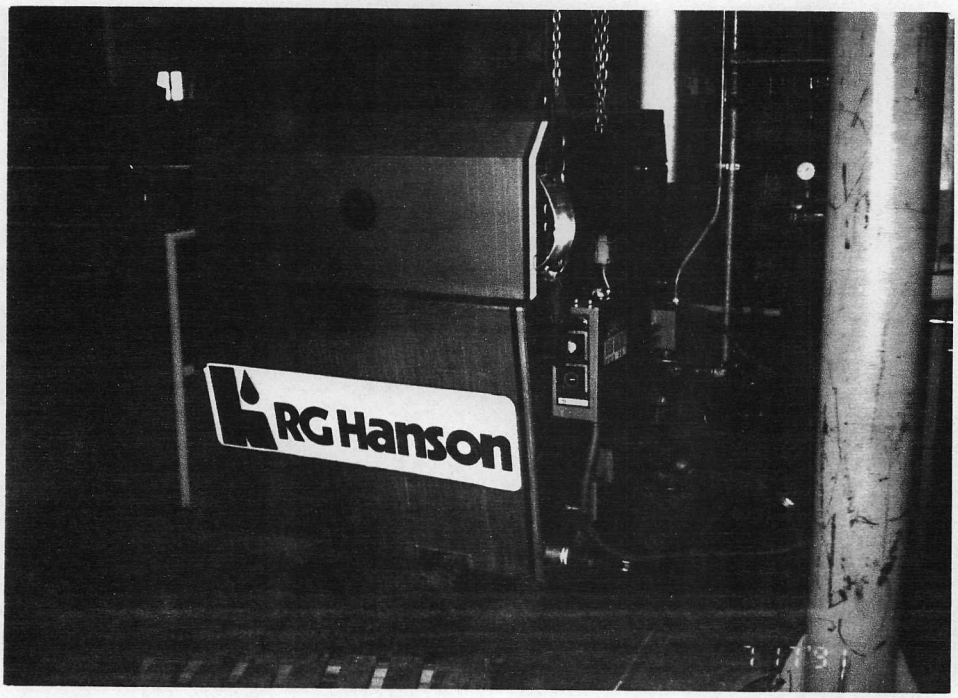
VISUAL SITE INSPECTION SUMMARY

The Eureka Company
1201 E. Bell Street
Bloomington, Illinois 61701
ILD 001 163 823

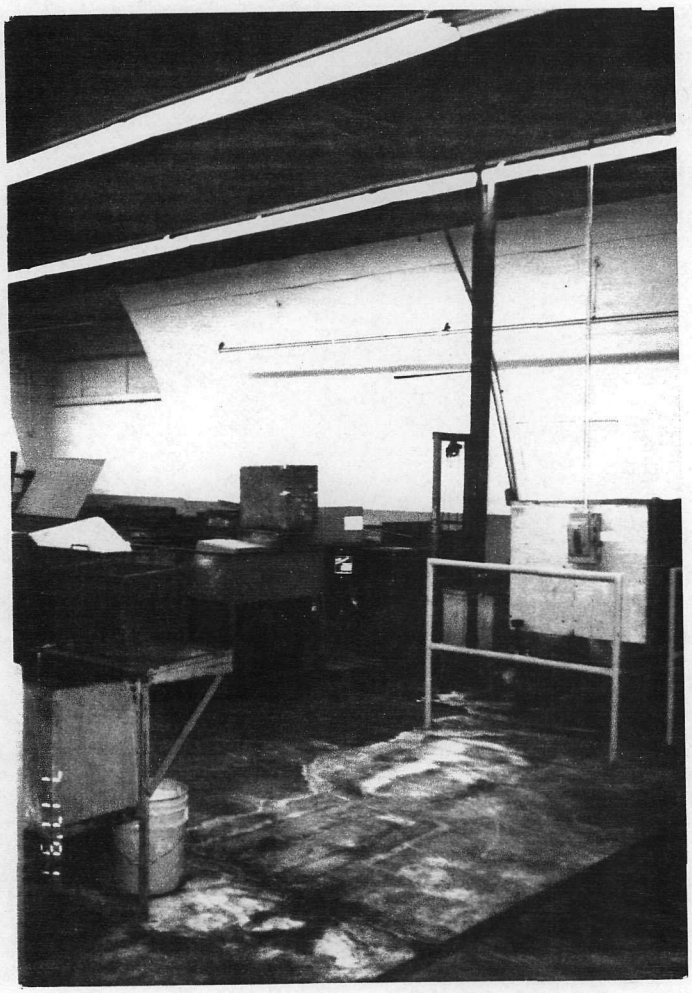
Date:	July 17 and 18, 1991
Facility Representatives:	Don E. Jenkins, Environmental Protection Engineer Dean A. Shoemaker, Environmental Engineer
Inspection Team:	Timothy J. Oliver, PRC Environmental Management, Inc. (PRC) Kenneth M. Valder, PRC
Photographer:	Kenneth M. Valder, PRC
Weather Conditions:	Sunny, 85°F, calm winds.
Summary of Activities:	The inspection team met with facility representatives at 8:00 a.m. on July 17. The purpose of the inspection was discussed, and Mr. Jenkins outlined the operations taking place in each area of the facility. At 8:50 a.m., the group started the walk-through inspection of Facility 1. A break was taken at 10:50 a.m., and more of the facility operations were discussed. At 11:15 a.m., the group started the inspection of Facility 2. The inspection concluded, and the inspection team left the facility at 12:35 p.m. The inspection team compiled a list of further information that was required and returned to the facility at 8:30 a.m. on July 18. The list was discussed with the facility representatives, and the inspection team left the facility at 9:00 a.m.



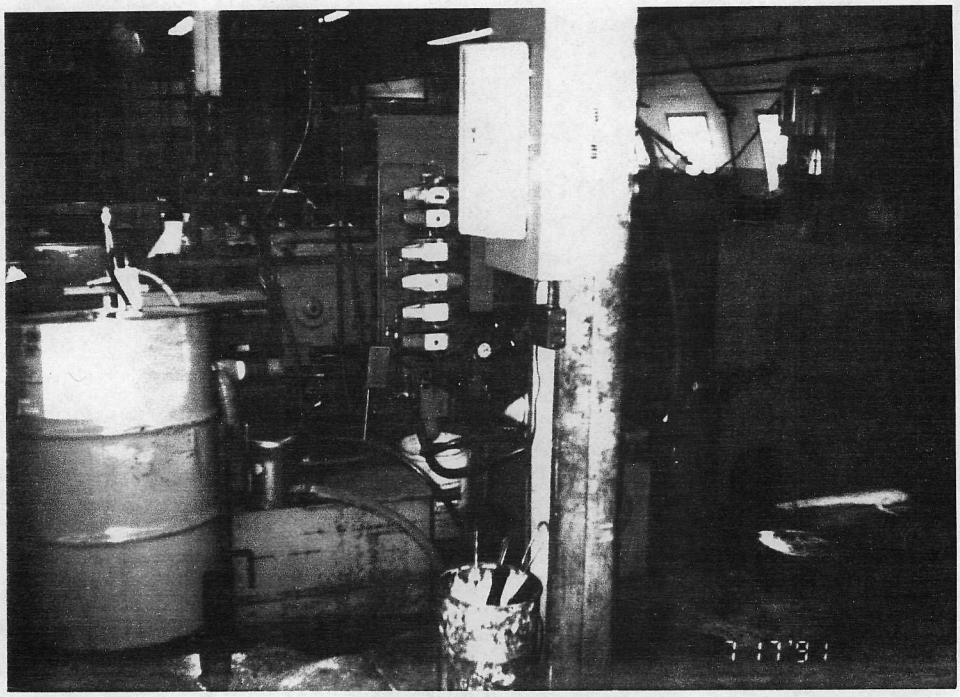
Photograph No. 1 Location: SWMU 1 -- Northwest corner of Building 7
Orientation: Northwest Date: 7/17/91
Description: Parts washer with oil separator and DSAA. The drum is located in the bottom left of the photograph.



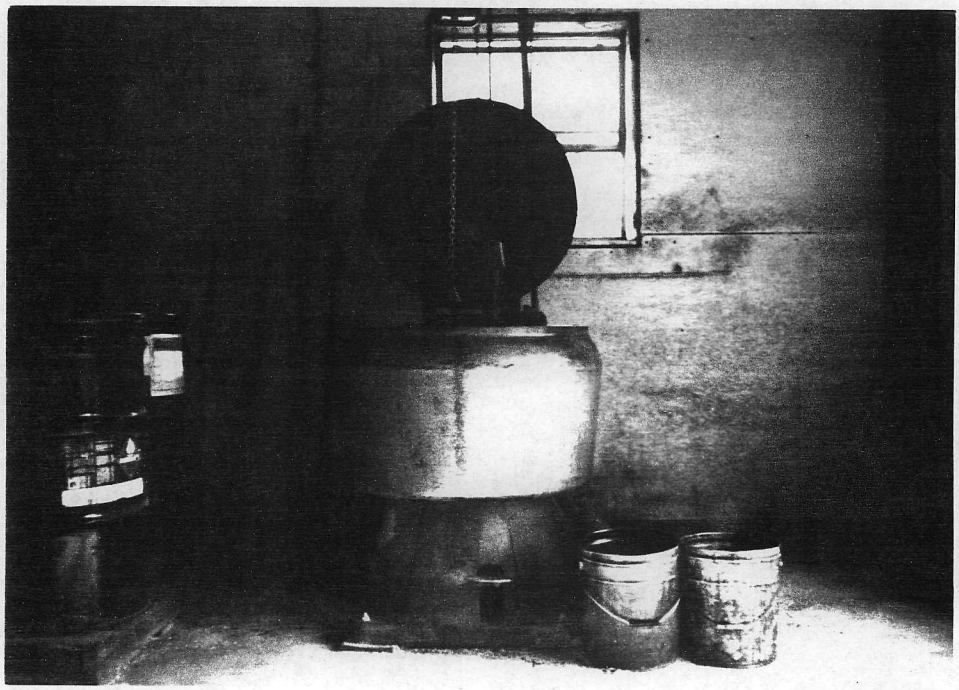
Photograph No. 2 Location: SWMU 2 -- Building 7
Orientation: Northeast Date: 7/17/91
Description: Alkaline parts washer and DSAA. The collection pail is located in the lower right of the photograph.



Photograph No. 3 Location: SWMU 3 -- Building 7
Orientation: Southwest Date: 7/17/91
Description: Old 1,1,1-TCA vapor degreaser area. The floor is covered with a crystalline substance, apparently from the sodium nitrate deburrer.

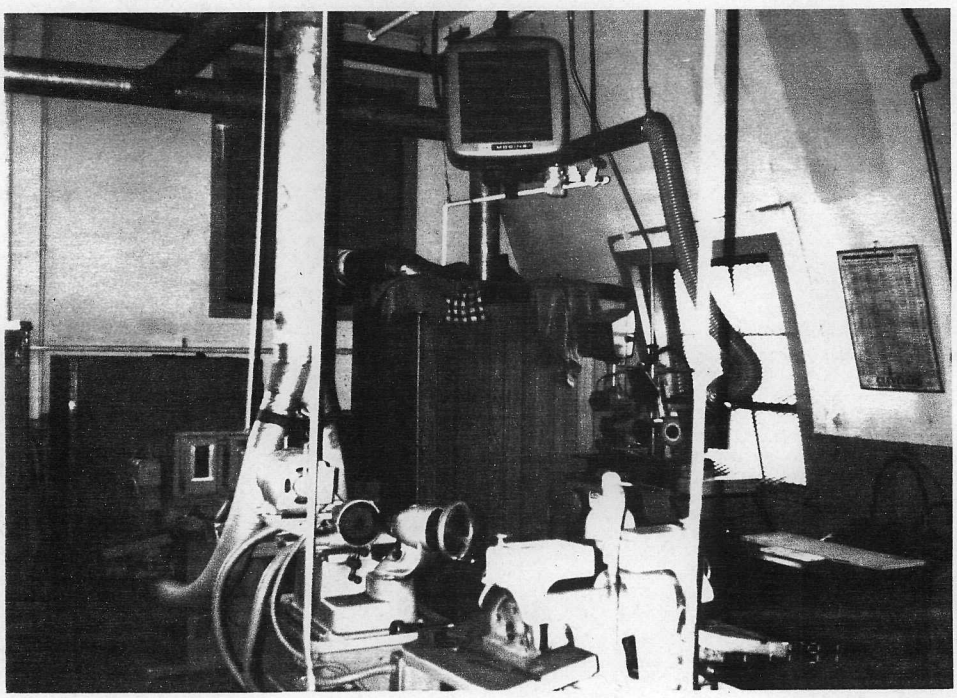


Photograph No. 4 Location: SWMU 5 -- Building 7
Orientation: North Date: 7/17/91
Description: Scrap coolant satellite waste accumulation drum.

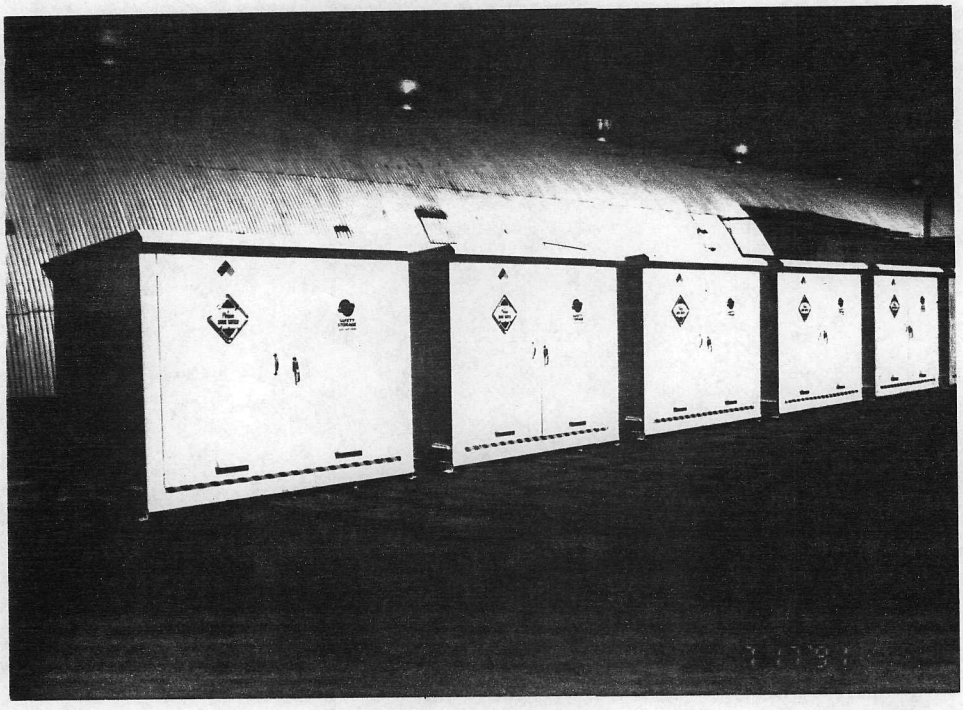


Photograph No. 5 Location: SWMU 6 -- Building 7
Orientation: North Date: 7/17/91
Description: Oil recovery centrifuge. The oil is collected in the pails to the right of the centrifuge.

Photograph No. 6 Location: SWMU 7 -- Building 7
Orientation: East Date: 7/17/91
Description: Waste oil and Stoddard solvent waste accumulation area. Notice the oil-dry on the floor in the lower left of the photograph.

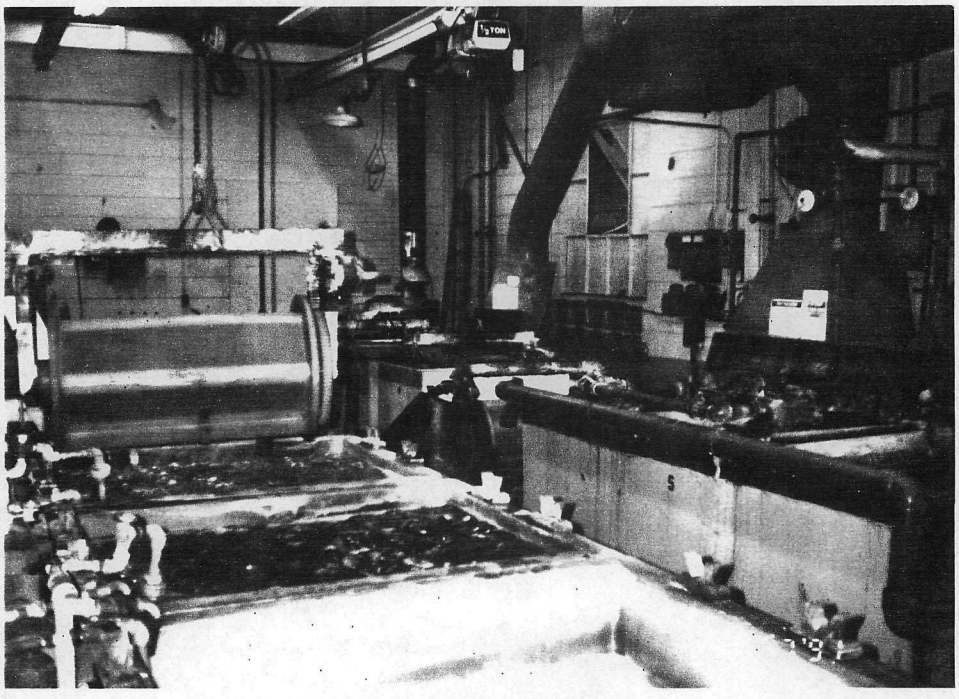


Photograph No. 7 Location: SWMU 8
Orientation: Southeast Date: 7/17/91
Description: Steel grinding room dust collector.



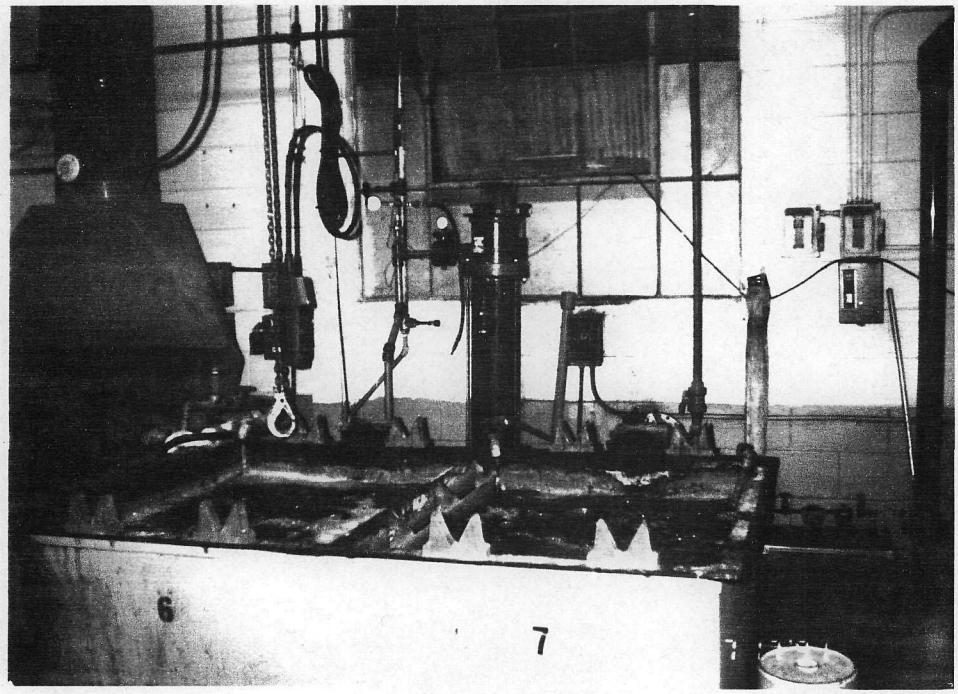
Photograph No. 8
Orientation: East-northeast
Description: New hazardous waste drum storage area.

Location: SWMU 9
Date: 7/17/91

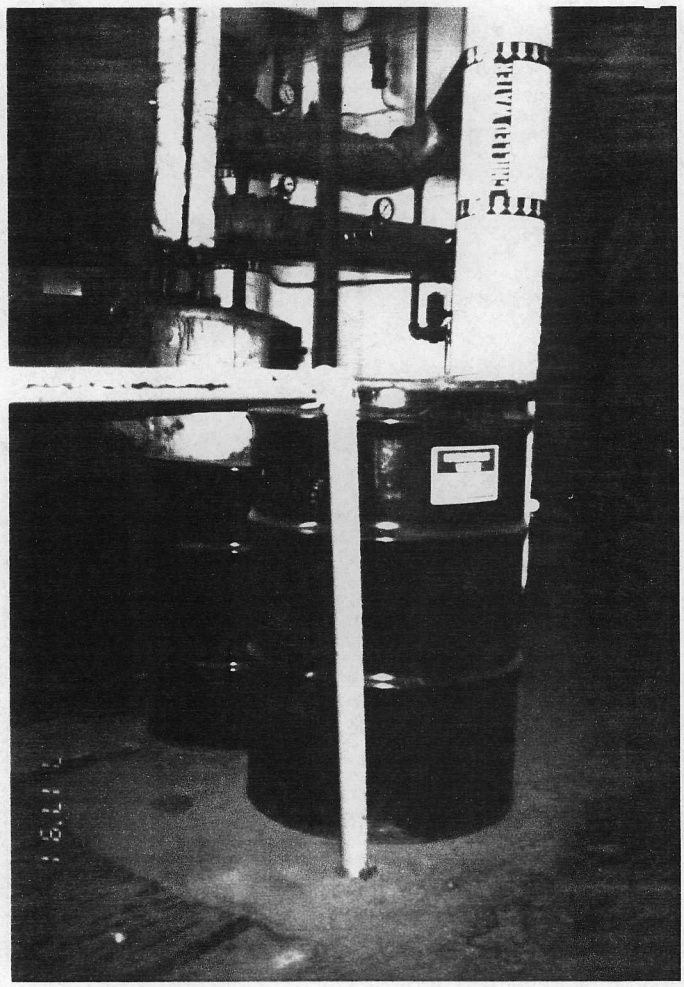


Photograph No. 9
Orientation: Northeast
Description: Zinc plating area.

Location: SWMU 10 -- Building 6B
Date: 7/17/91

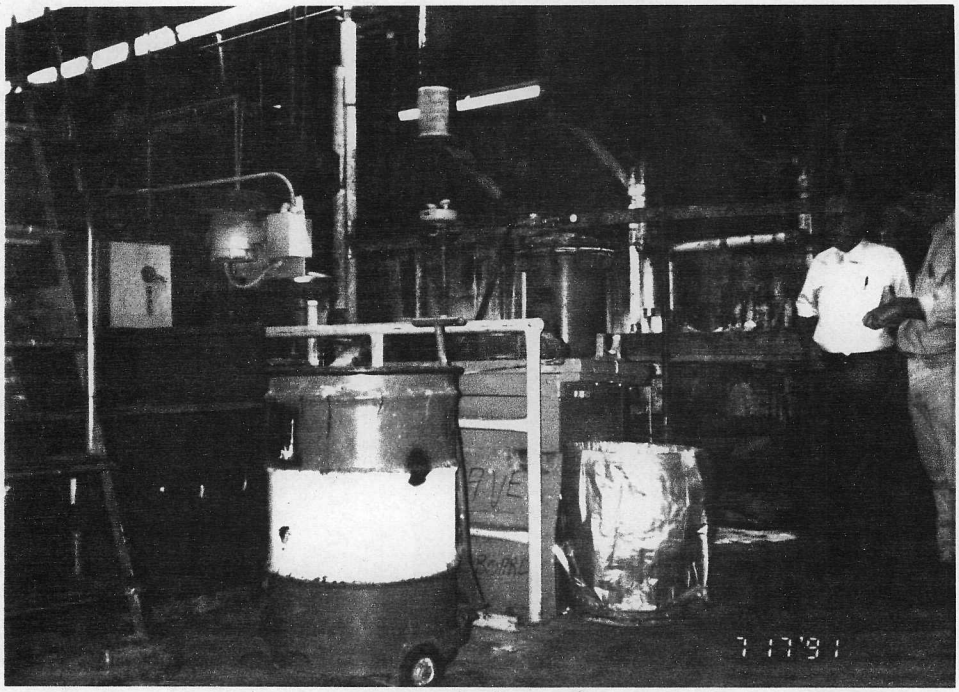


Photograph No. 10 Location: SWMU 10 -- Building 6B
Orientation: South Date: 7/17/91
Description: Former gold-chromium finish plating tanks, now used for water rinsing.

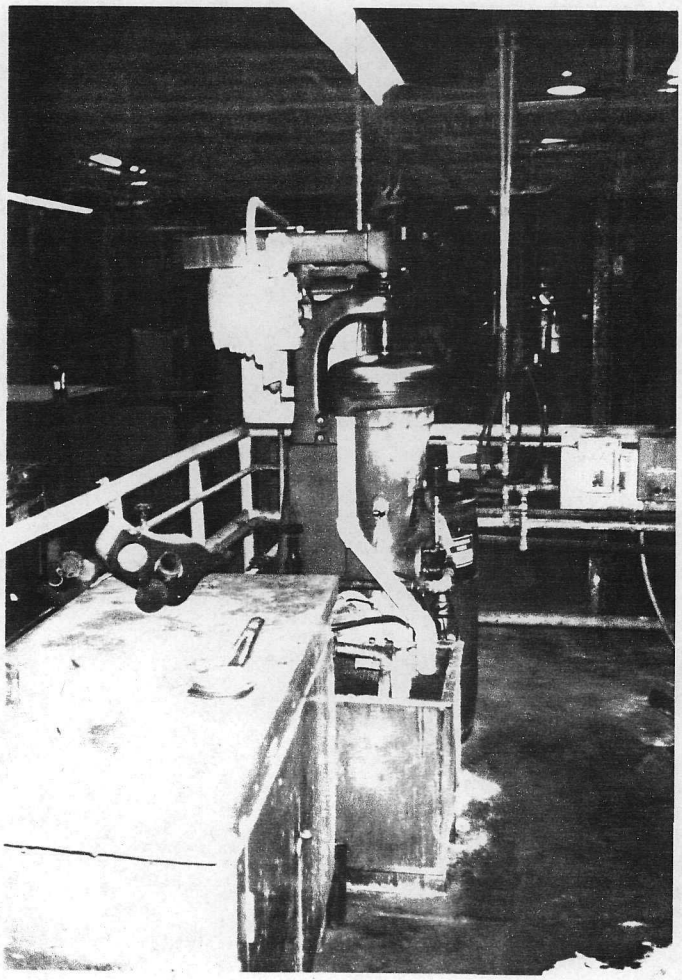


Photograph No. 11
Orientation: Southeast
Description: Zinc filter DSAA.

Location: SWMU 11
Date: 7/17/91



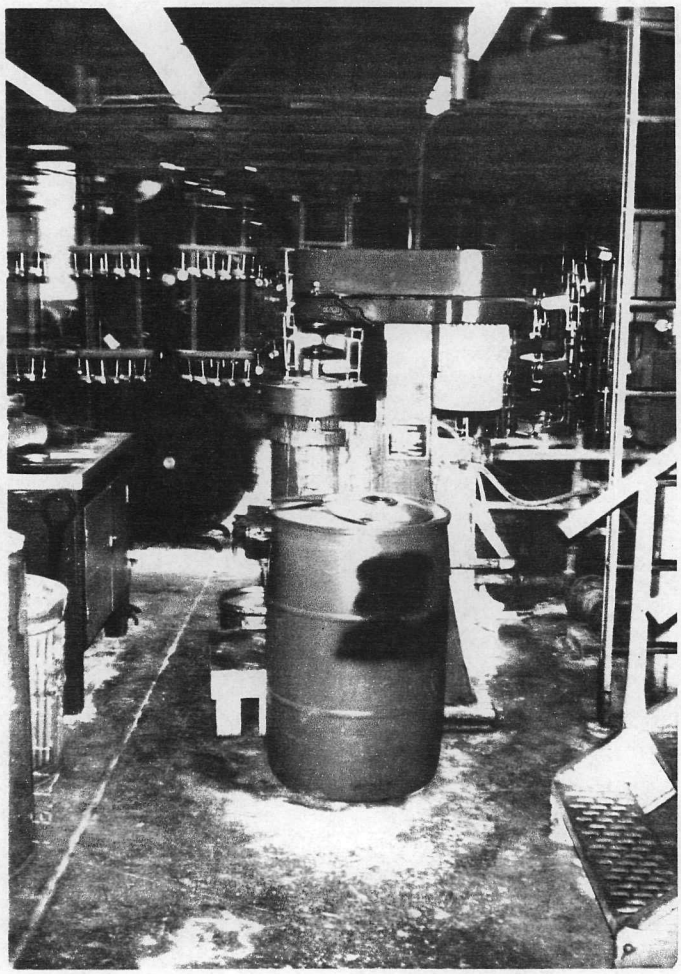
Photograph No. 12 Location: SWMU 12 -- Building 6B
Orientation: Southeast Date: 7/17/91
Description: Nickel sludge collection drum for Ni/Cr plating lines 1 and 2.



Photograph No. 13
Orientation: East
Description: Tramp oil in alkali DSAA.

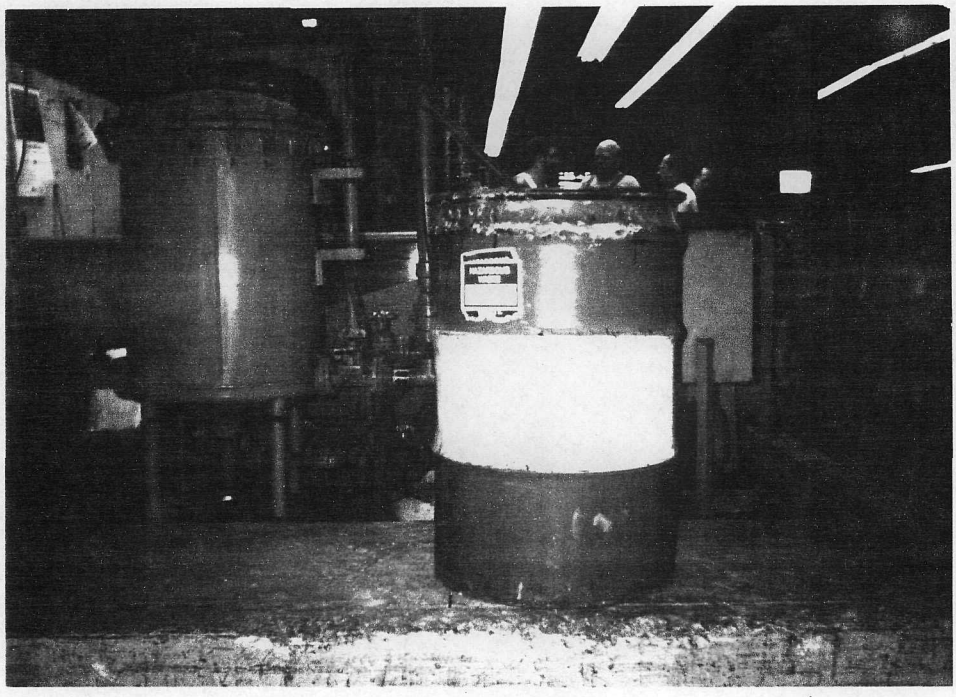
Location: SWMU 14 -- Building 6B
Date: 7/17/91

Photograph No. 14 Location: Building 6B
Orientation: Northwest Date: 7/17/91
Description: Area where trichrome additive spill occurred in 1982. The area was not trenched at the time. Product chemicals are stored here.

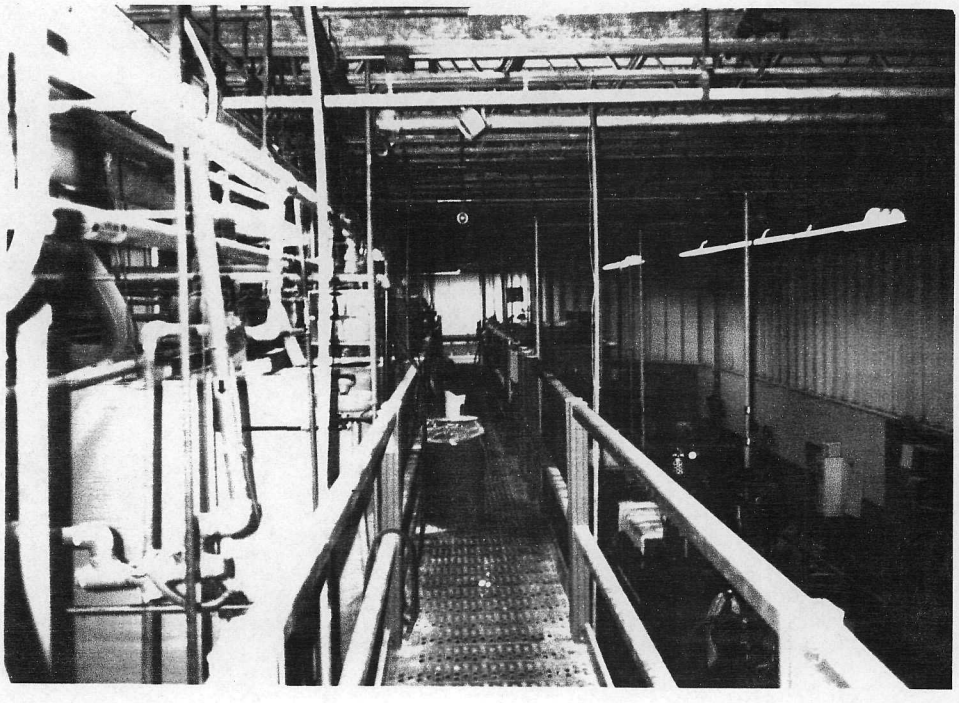


Photograph No. 15
Orientation: North
Description: Tramp oil in alkali DSAA for Ni/Cr plating line 3.

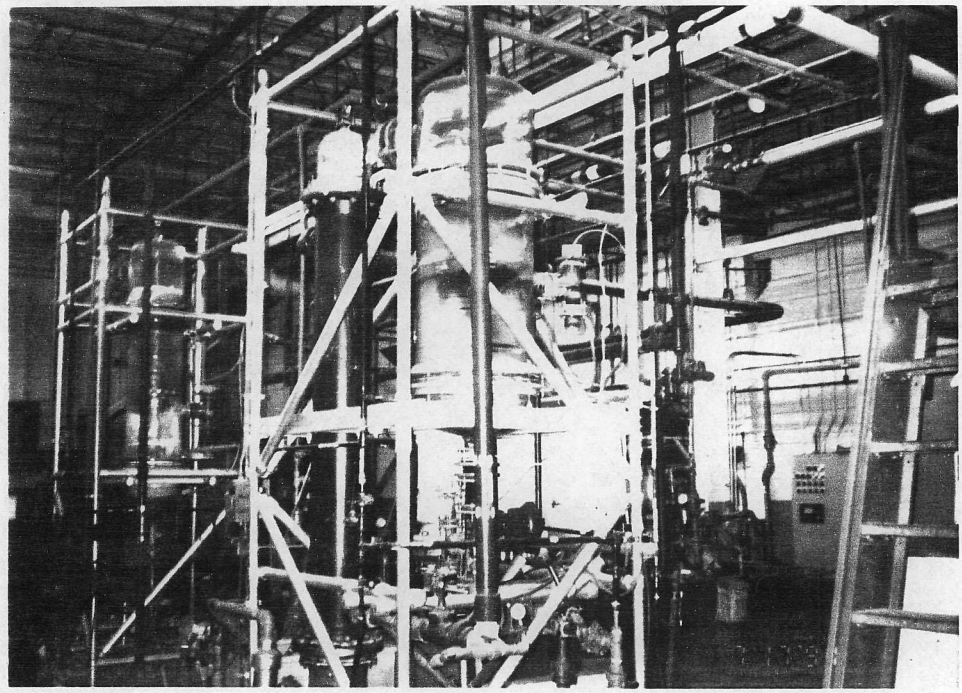
Location: SWMU 15
Date: 7/17/91



Photograph No. 16 Location: SWMU 13 -- Building 6B
Orientation: South Date: 7/17/91
Description: Nickel sludge collection drum for plating line 3.

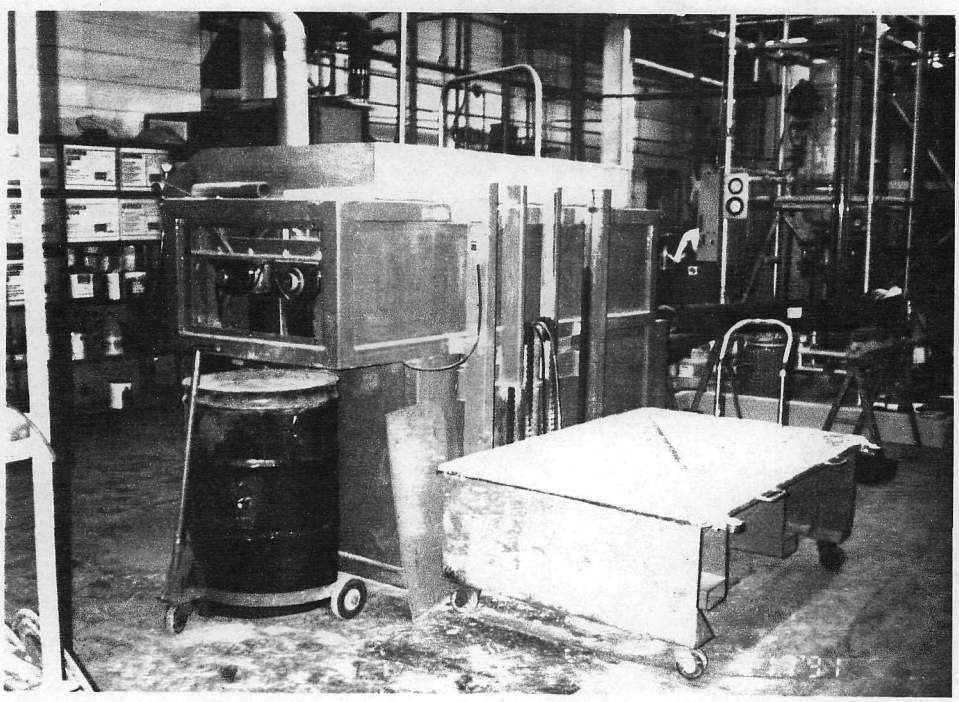


Photograph No. 17 Location: SWMU 16 -- Building 6B
Orientation: West Date: 7/17/91
Description: Wastewater treatment plant. Tanks are located to the left and right. The sludge filters can be seen in the lower right portion of the photograph.



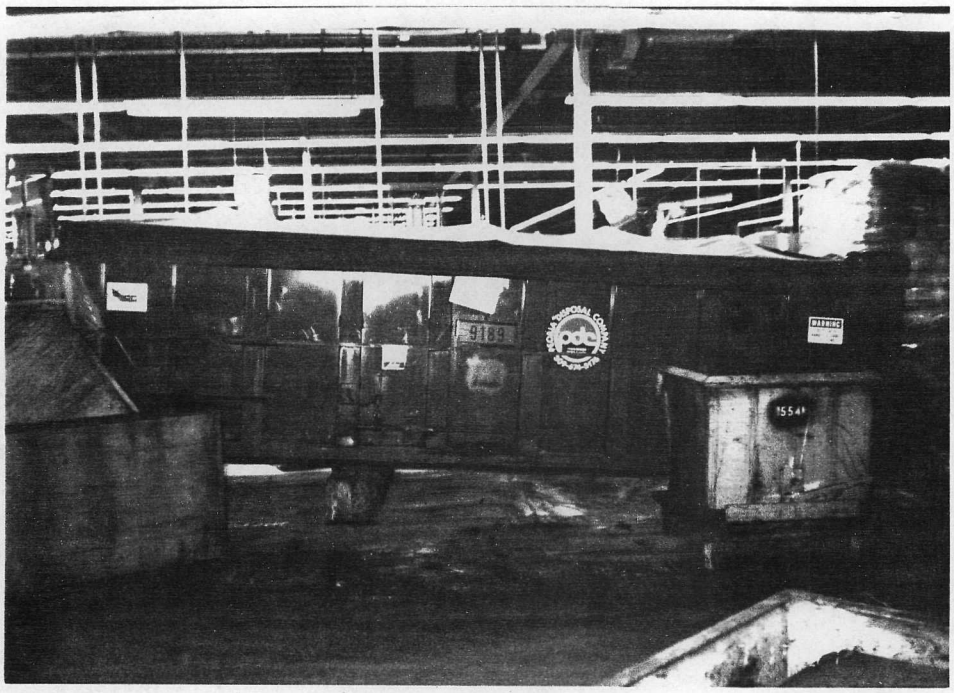
Photograph No. 18
Orientation: Southeast
Description: Nickel evaporation columns.

Location: SWMU 17
Date: 7/17/91

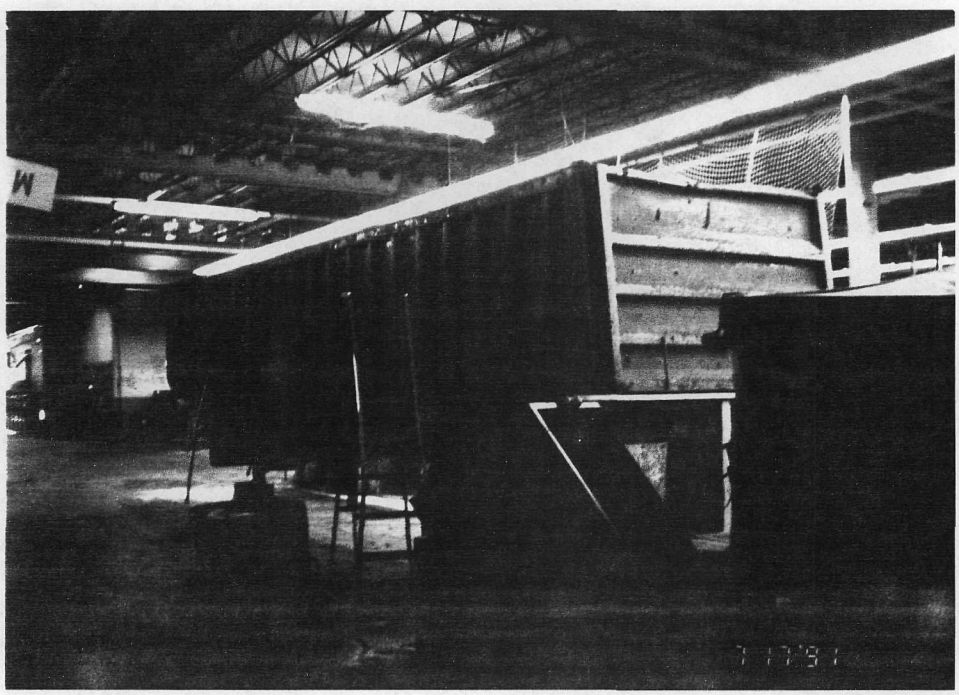


Photograph No. 19
Orientation: Southeast
Description: Sludge drier and dry sludge drum.

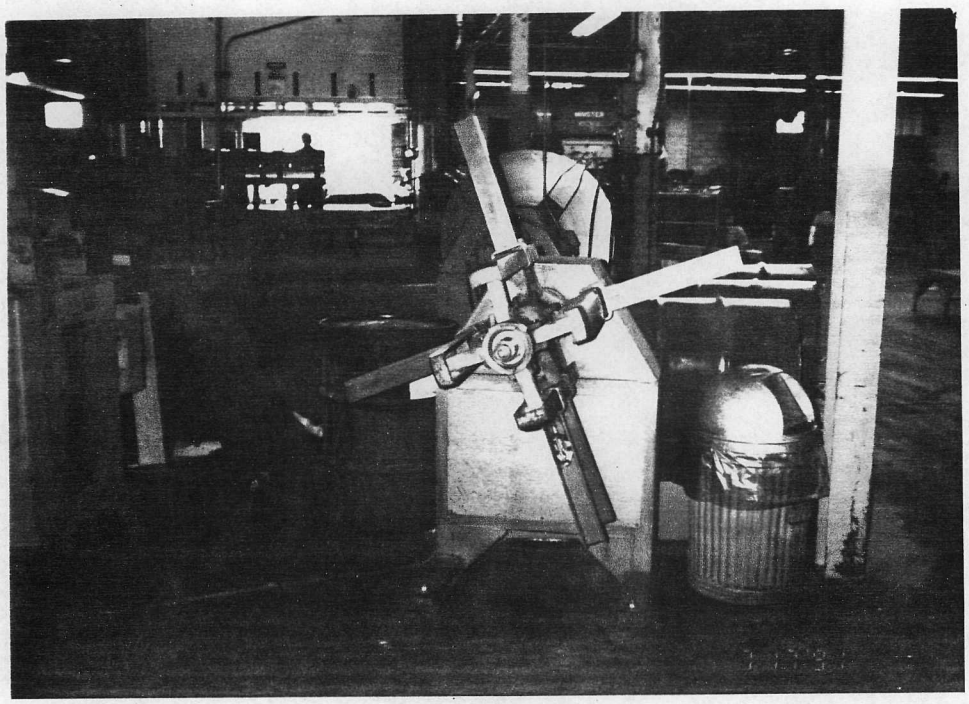
Location: SWMU 18 -- Building 6B
Date: 7/17/91



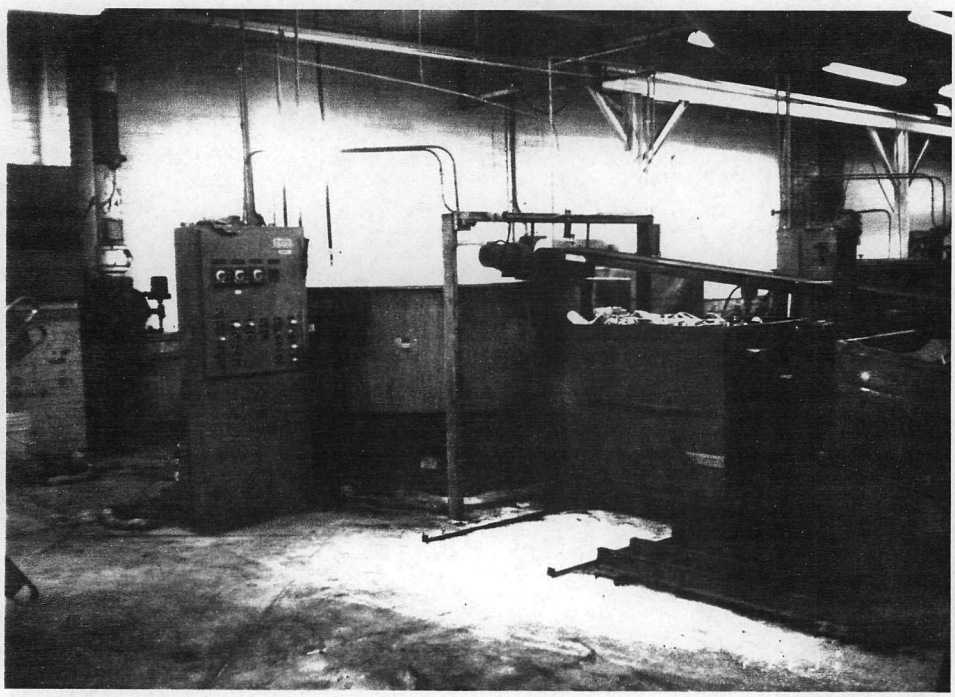
Photograph No. 20 Location: SWMU 19 -- Building 6C
Orientation: West Date: 7/17/91
Description: Plating sludge roll-off box.



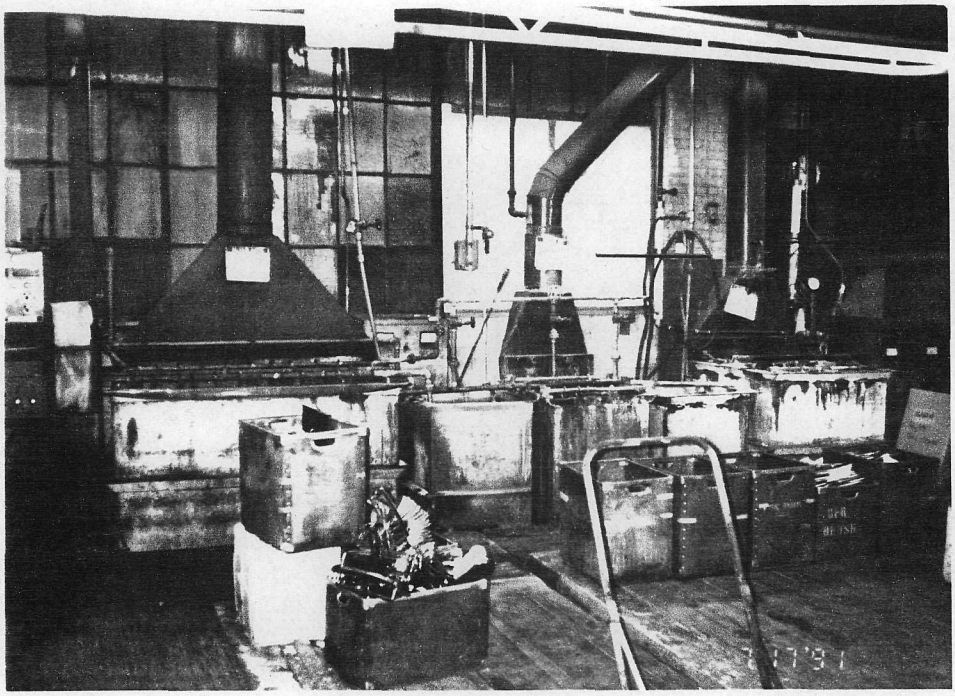
Photograph No. 21 Location: SWMU 20 -- Building 6C
Orientation: Southeast Date: 7/17/91
Description: Scrap metal trailer. Note oil-dry spread on the floor to collect waste oil from trailer.



Photograph No. 22 Location: SWMU 22 -- Building 6
Orientation: South Date: 7/17/91
Description: Waste oil DSAA for punch presses in the area.

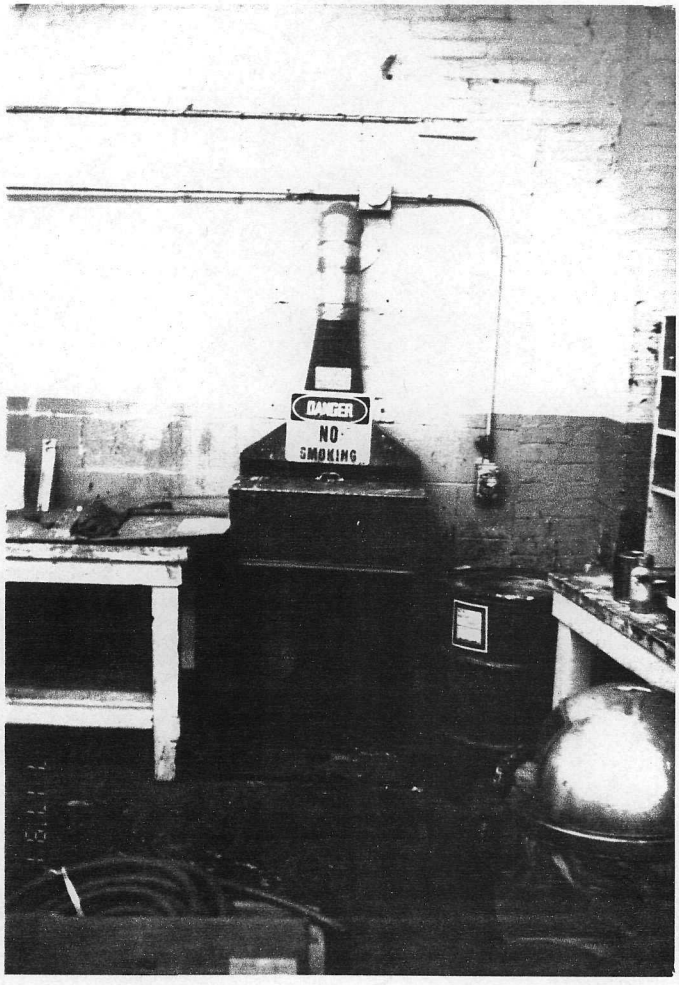


Photograph No. 23 Location: Building 6
Orientation: Southeast Date: 7/17/91
Description: Roto-Finish machine.



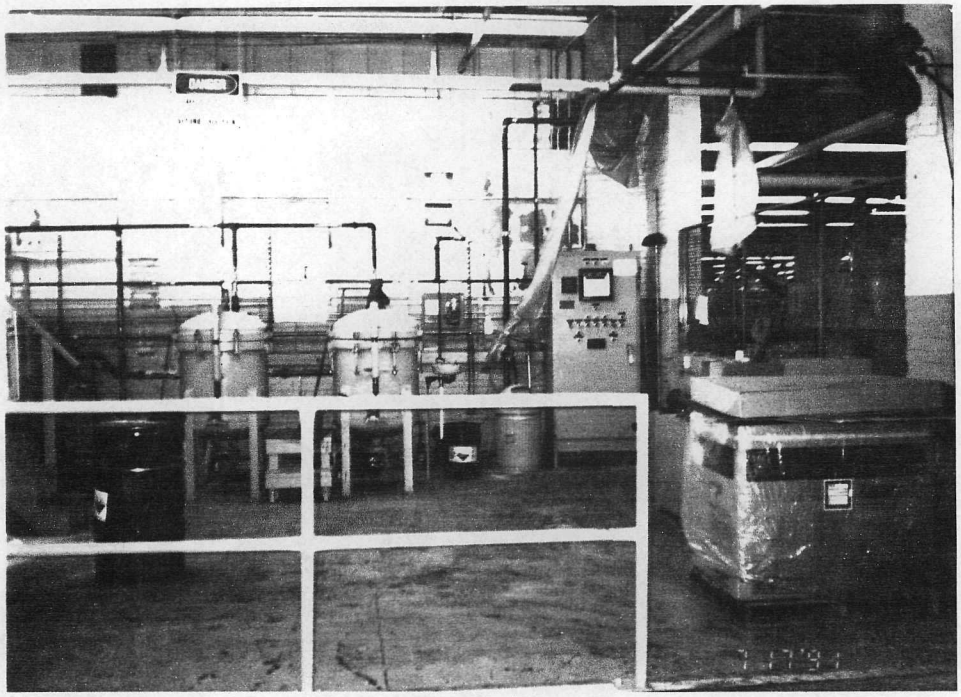
Photograph No. 24
Orientation: South
Description: Nickel strip area.

Location: SWMU 23 -- Building 6A
Date: 7/17/91



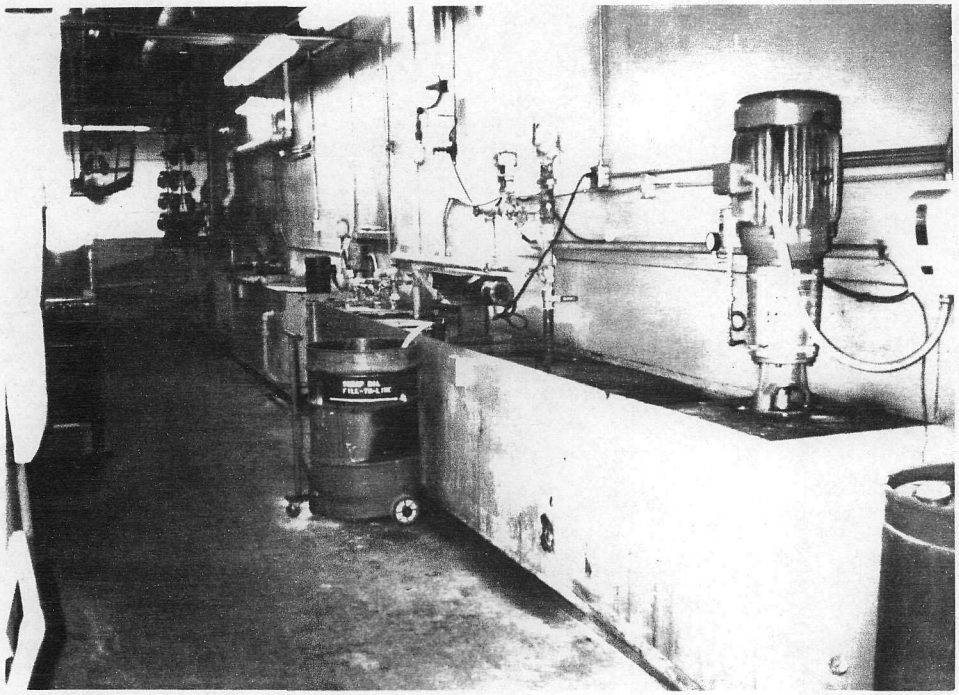
Photograph No. 25
Orientation: East
Description: IPA parts washer and sludge collection drum.

Location: SWMU 25 -- Building 5
Date: 7/17/91

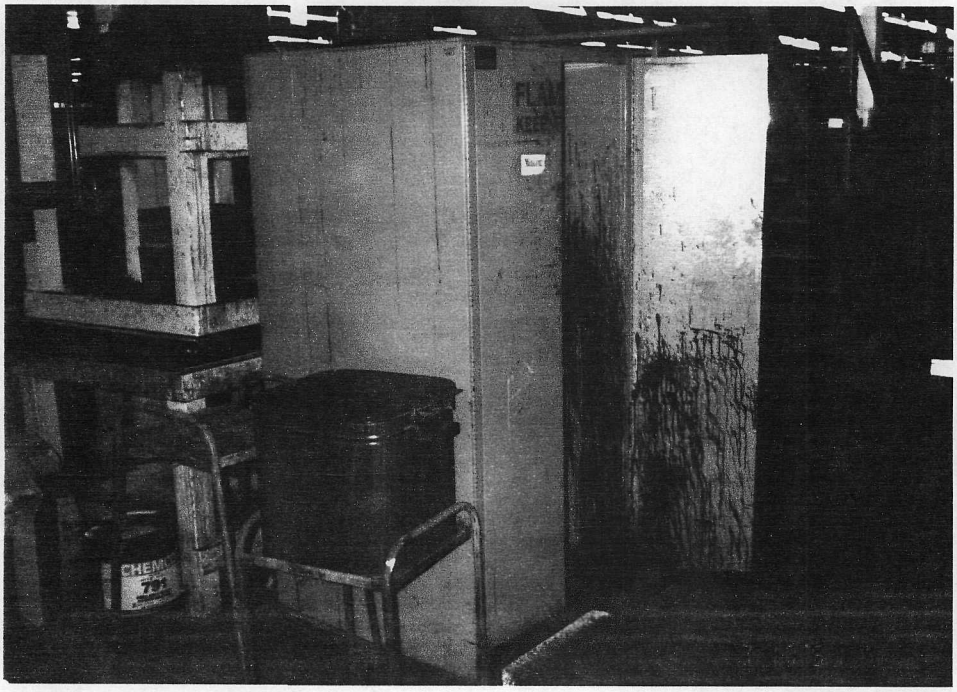


Photograph No. 26 — Location: SWMU 26 -- Building 1B
Orientation: North — Date: 7/17/91
Description: Parts washer wastewater treatment plant.

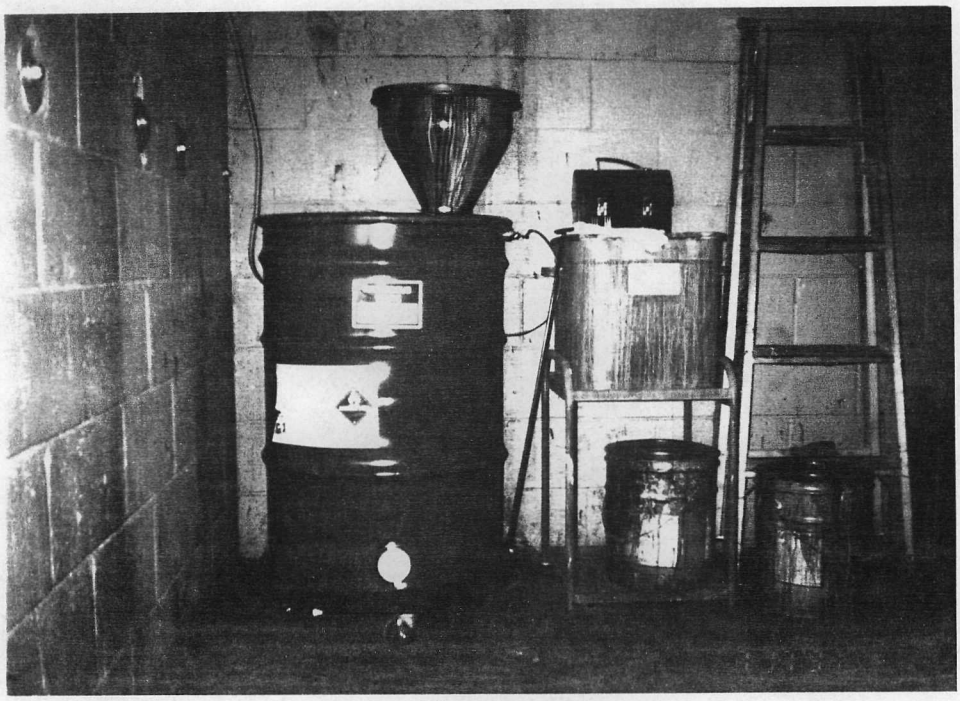
Photograph No. 27 — Location: SWMU 27 -- Building 1
Orientation: North — Date: 7/17/91
Description: Paint mixing room DSAA.



Photograph No. 28 Location: SWMU 28 -- Building 1
Orientation: Southwest Date: 7/17/91
Description: Phosphoric acid parts washer oil separator collection drum.

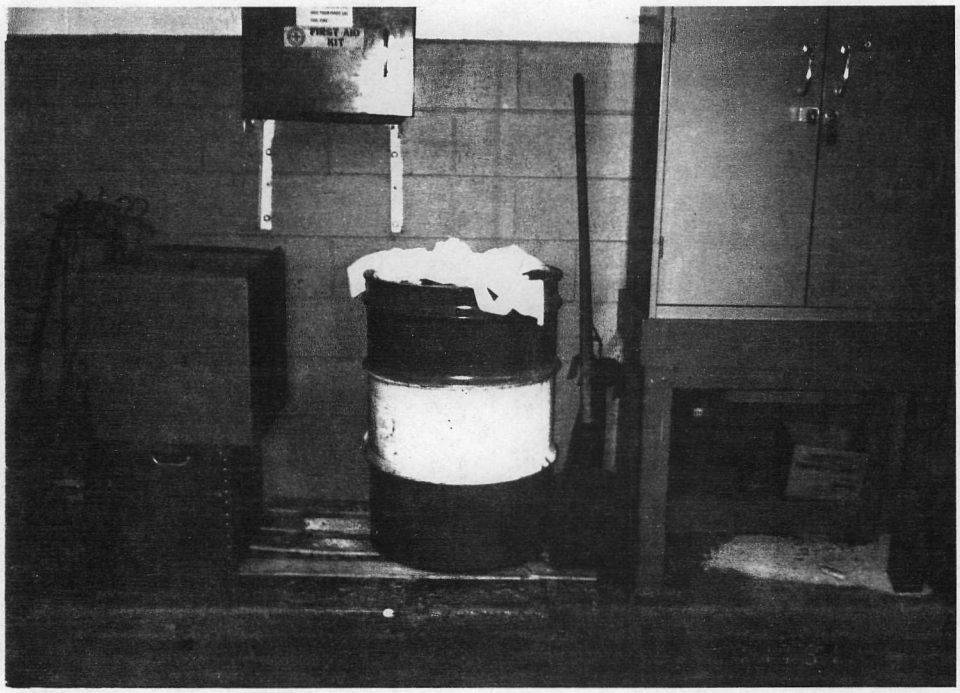


Photograph No. 29 Location: SWMU 29 -- Building 1
Orientation: Northeast Date: 7/17/91
Description: Old paint solvent storage cabinet.



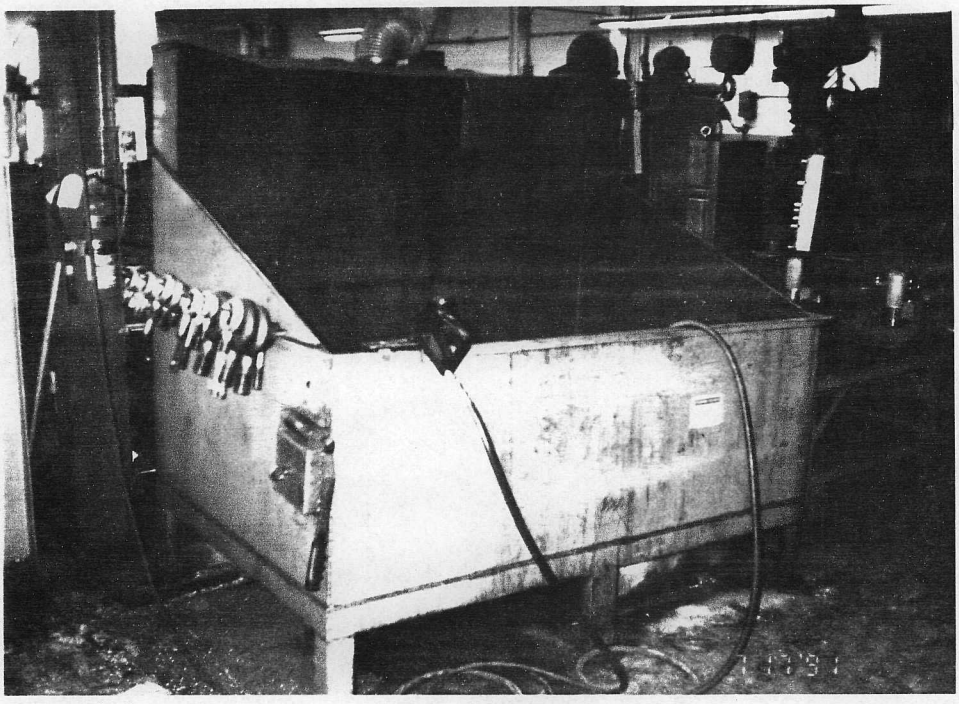
Photograph No. 30
Orientation: East
Description: Paint spray room DSAA.

Location: SWMU 30 -- Building 1 Paint Shop
Date: 7/17/91

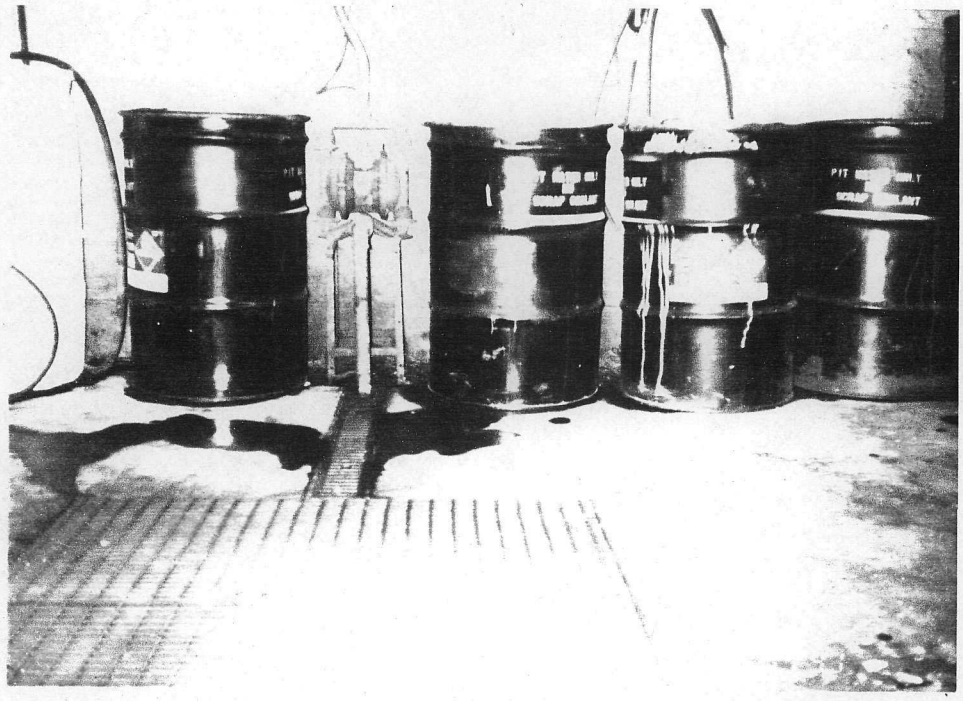


Photograph No. 31
Orientation: South
Description: Paint chip collection drum. Note waste on floor around drum.

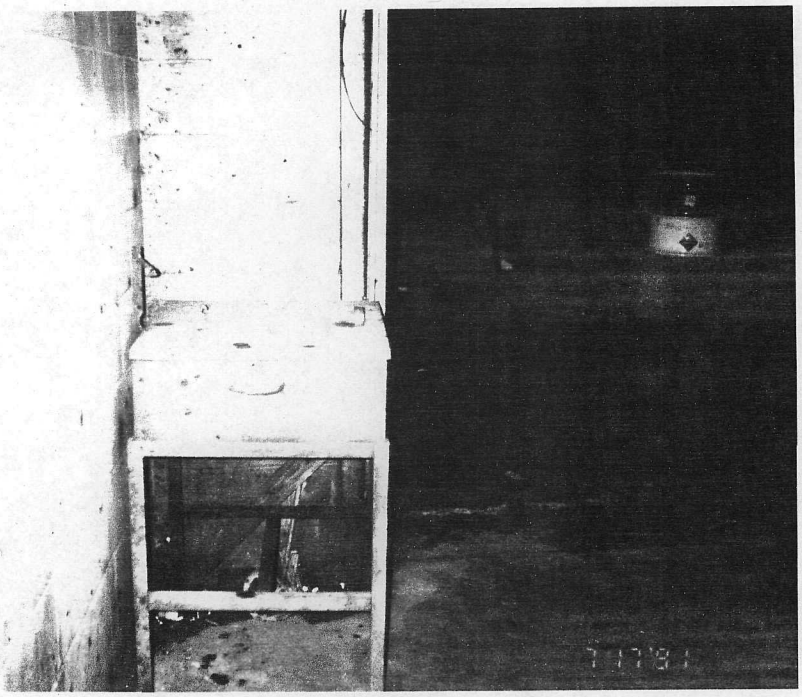
Location: SWMU 31 -- Building 1
Date: 7/17/91



Photograph No. 32 Location: SWMU 32 -- Building 3
Orientation: Northeast Date: 7/17/91
Description: One of three Stoddard solvent washers. Wastes are collected underneath the tanks.



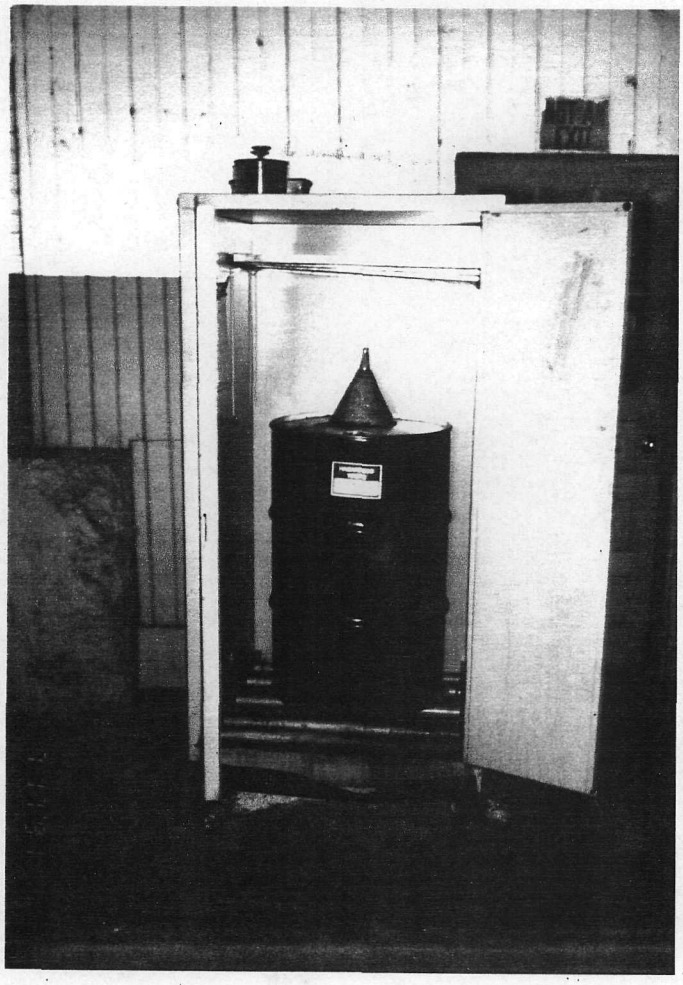
Photograph No. 33 Location: SWMU 33 -- Building 3
Orientation: South Date: 7/17/91
Description: Waste oil collection drums.



Photograph No. 34
Orientation: East
Description: Stoddard solvent parts cleaner.

Location: SWMU 33 -- Building 3
Date: 7/17/91

Photograph No. 35 Location: SWMU 34 -- Building 5D
Orientation: South Date: 7/17/91
Description: Parts washer and oil skimmer. The collection drum can be seen in the center of the photograph.



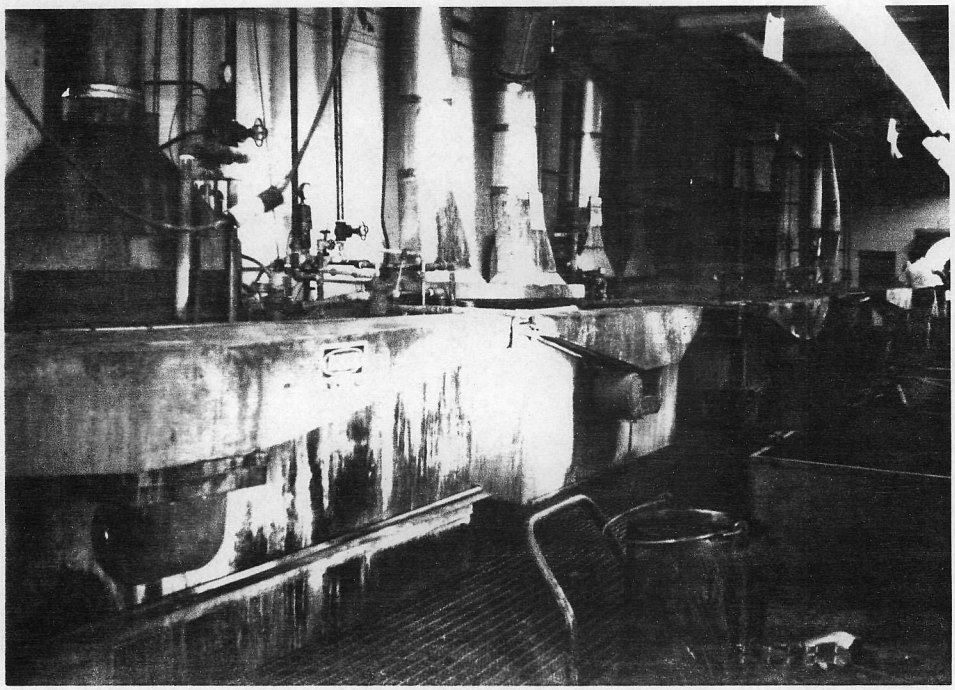
Photograph No. 36
Location: SWMU 35 -- Building 5E
Orientation: North
Date: 7/17/91
Description: Stoddard solvent storage cabinet.

Photograph No. 37
Orientation: West
Description: Waste oil storage drums.

Location: SWMU 35 -- Building 5E
Date: 7/17/91

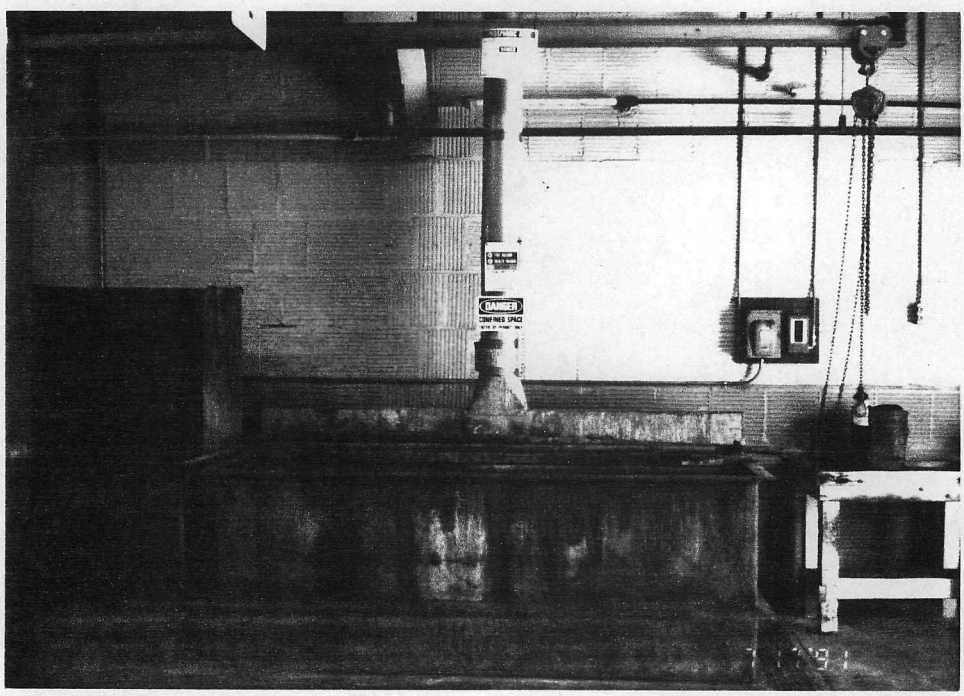
Photograph No. 38
Orientation: North
Description: Waste oil collection drum for paint strip area.

Location: SWMU 38 -- Building 7T
Date: 7/17/91



Photograph No. 39
Orientation: Northeast
Description: Paint strip tanks.

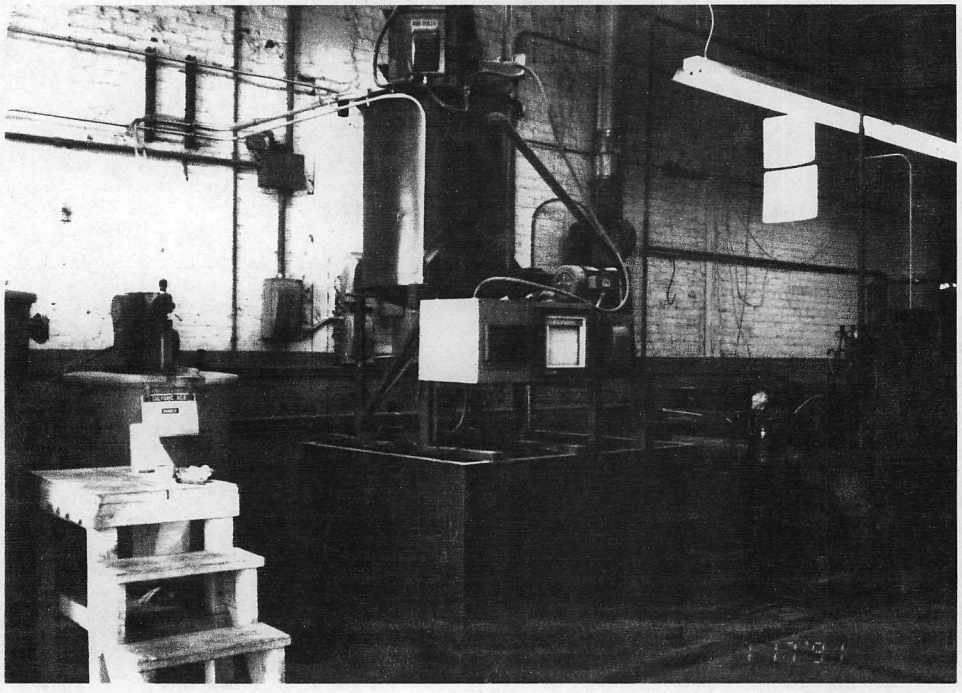
Location: SWMU 38 -- Building 7T
Date: 7/17/91



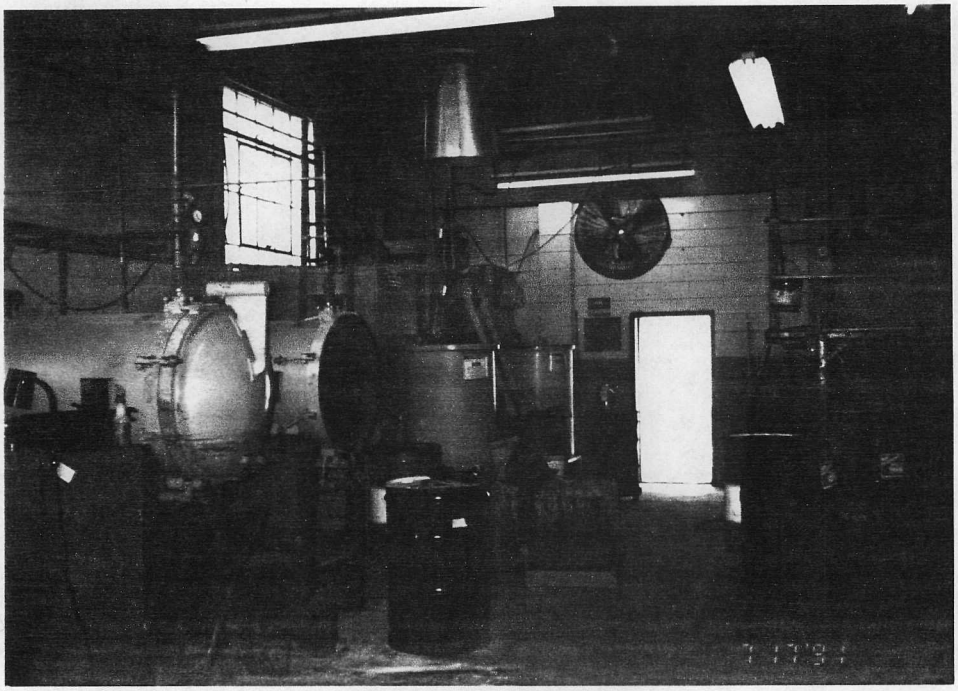
Photograph No. 40
Orientation: South
Description: Phosphoric acid derusting tank.

Location: SWMU 39 -- Building 7T
Date: 7/17/91

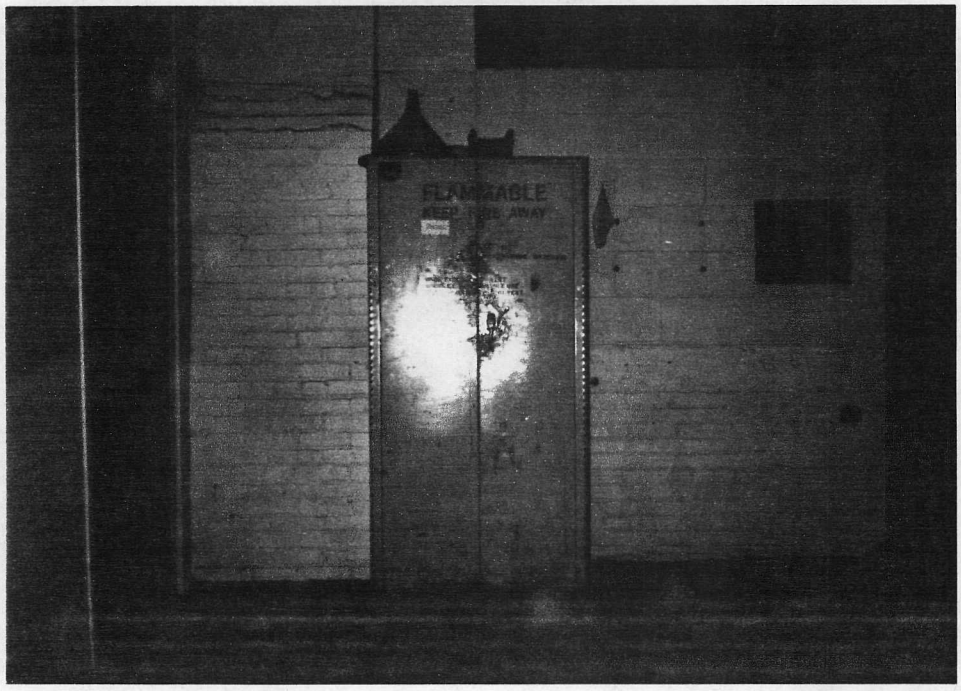
Photograph No. 41 Location: SWMU 40 -- Building 4T
Orientation: North Date: 7/17/91
Description: Gaylord box for collection of neutralized paint sludge.



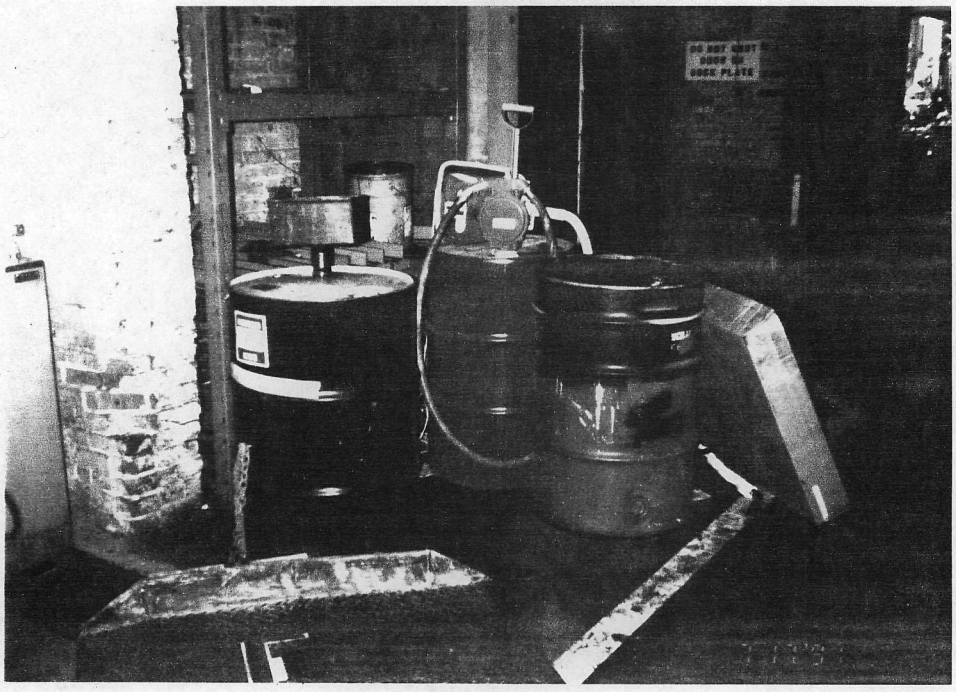
Photograph No. 42 Location: SWMU 40 -- Building 4T
Orientation: Northwest Date: 7/17/91
Description: Part of the treatment system for the Plant 2 wastewater treatment plant.



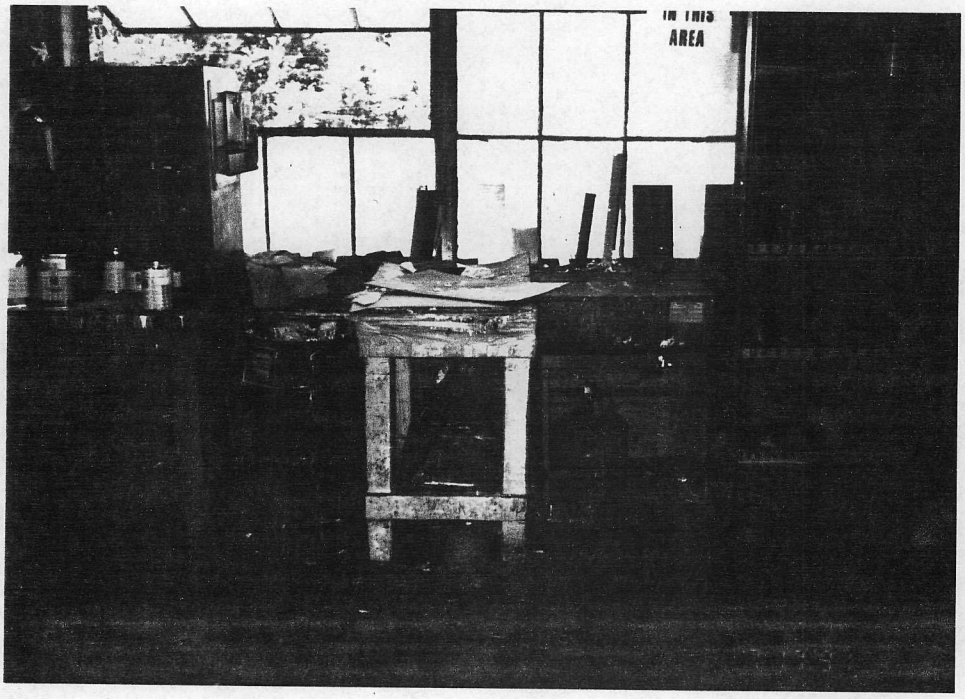
Photograph No. 43 Location: SWMUs 40 and 41 -- Building 4T
Orientation: North-northwest Date: 7/17/91
Description: Wastewater treatment plant is on the left; oil separator system is on the right.



Photograph No. 44 Location: SWMU 44 -- Building 2T
Orientation: North Date: 7/17/91
Description: Old paint spray room waste cabinet for Plant 2 spray booths.



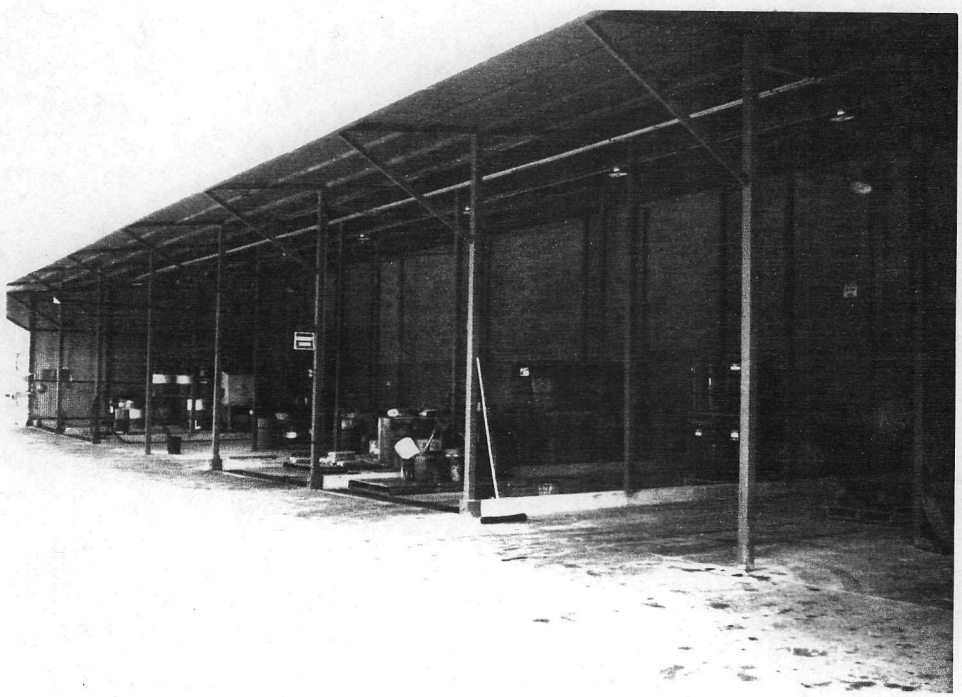
Photograph No. 45 Location: SWMU 45 -- Building 5T
Orientation: North-northwest Date: 7/17/91
Description: Waste oil and solvent DSAA in the plastic injection molding area.



Photograph No. 46 Location: SWMU 46 -- Building 5T
Orientation: West Date: 7/17/91
Description: Parts washer and dried paint collection drum in the plastic injection molding area.

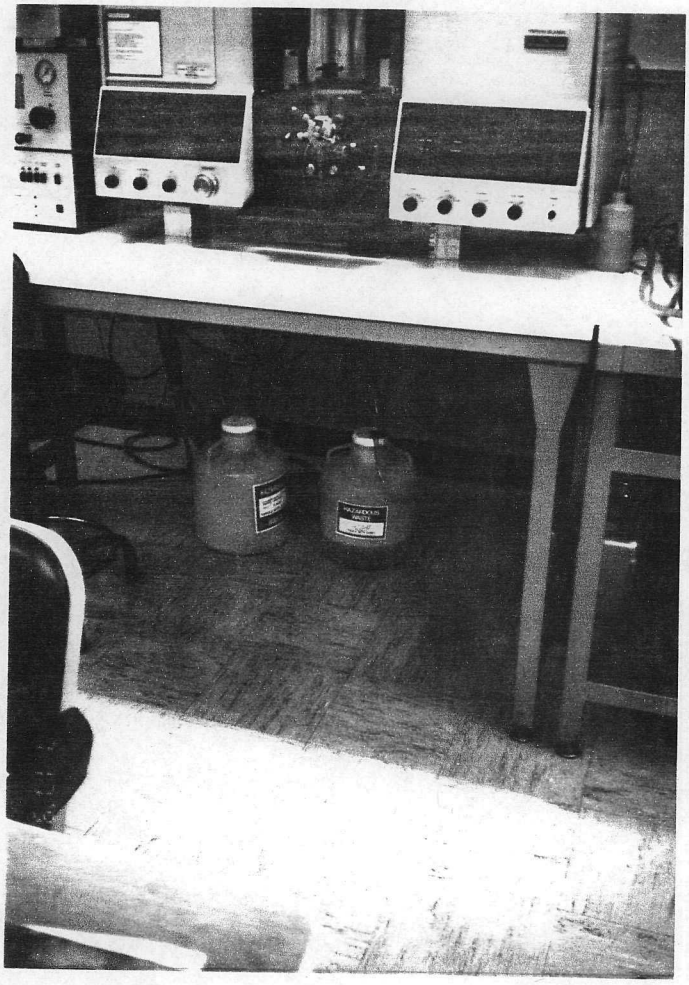
Photograph No. 47
Orientation: Southeast
Description: Nonhazardous waste roll-off box.

Location: SWMU 47
Date: 7/17/91

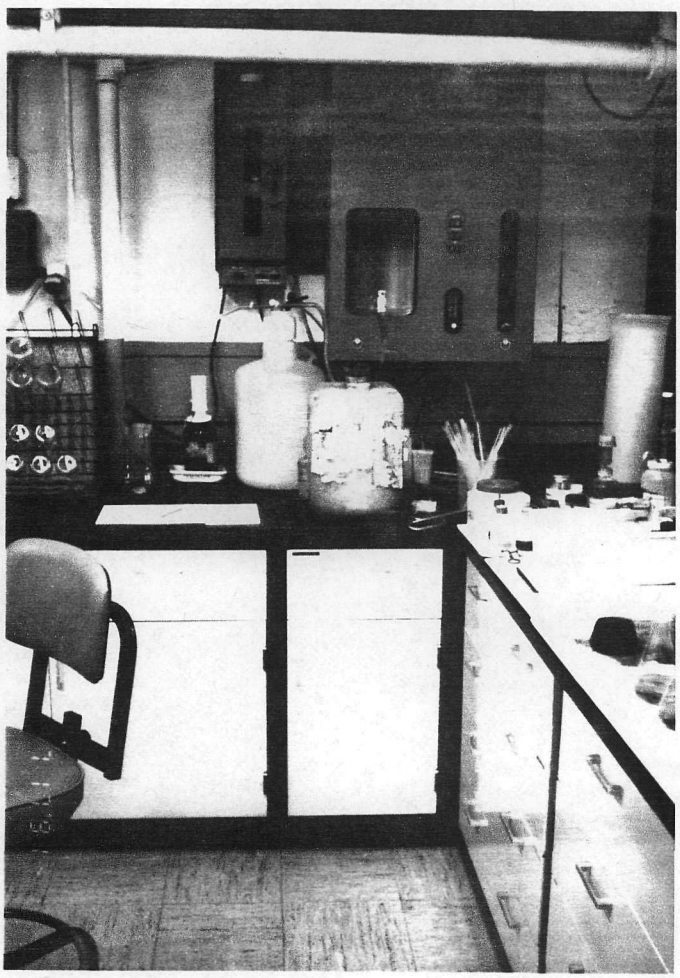


Photograph No. 48
Orientation: Northeast
Description: RCRA container storage area.

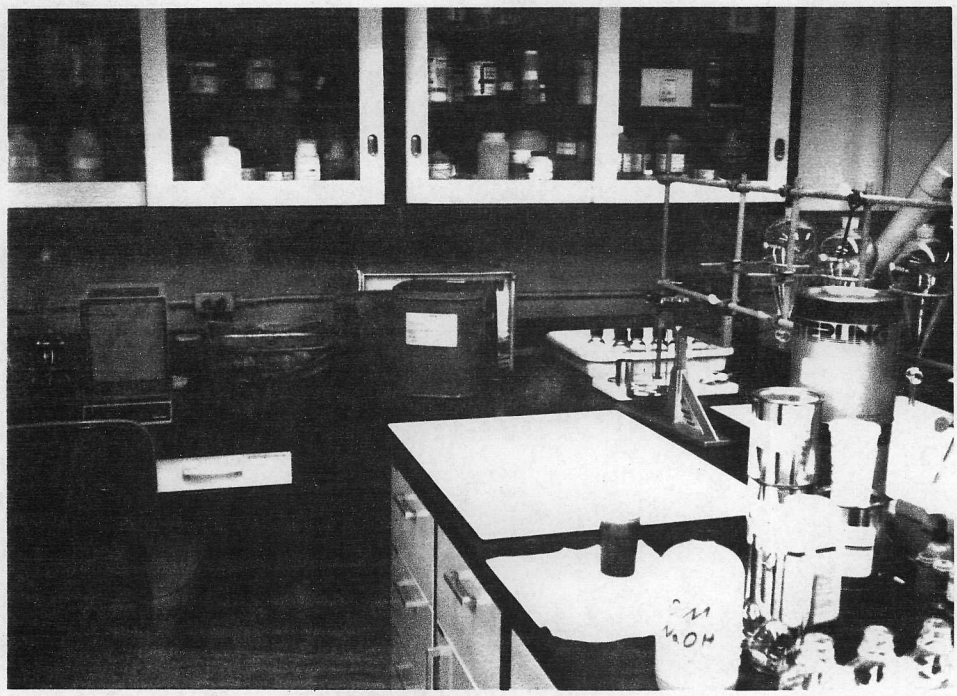
Location: SWMU 48
Date: 7/17/91



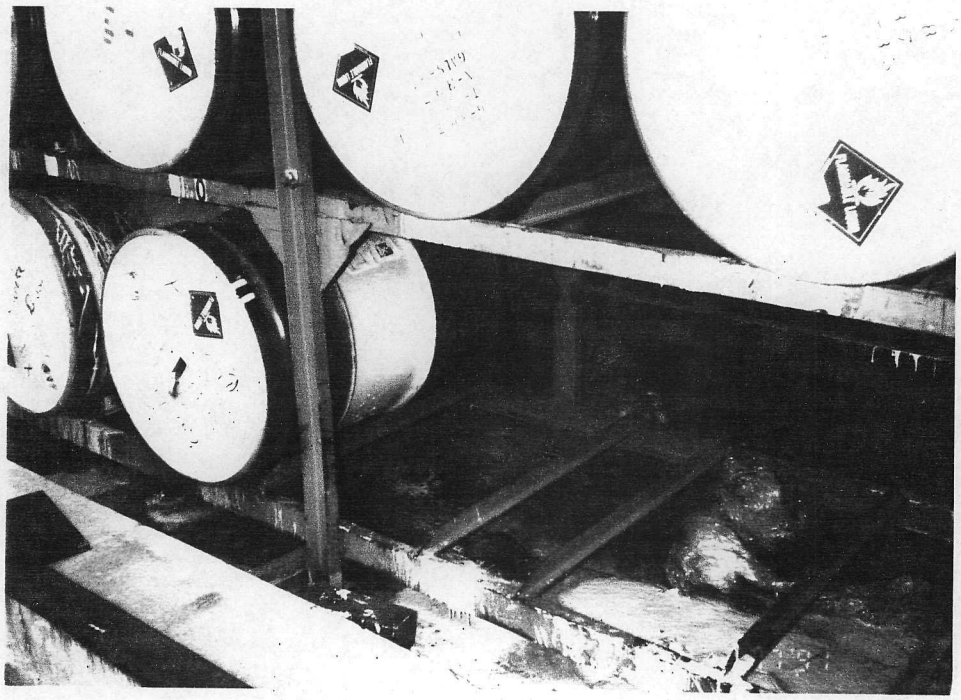
Photograph No. 49 Location: SWMU 36 -- Building 5A
Orientation: Southeast Date: 7/17/91
Description: Atomic absorption materials container in chemistry laboratory.



Photograph No. 50 Location: SWMU 36 -- Building 5A
Orientation: East Date: 7/17/91
Description: Plating tank waste container in chemistry laboratory.



Photograph No. 51 Location: SWMU 36 -- Building 5A
Orientation: East Date: 7/17/91
Description: Paint waste container in chemistry laboratory.



Photograph No. 52 Location: SWMU 37 -- Building 11
Orientation: Northeast Date: 7/17/91
Description: Paint and dead pigeons on floor of the product paint and solvents storage area.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Eureka, Bloomington

0850 DJ DS 7/18/91
TO RV

1. Oil separator/Parts washer drum collection SAA
concrete no dike
biodeg. oil only
→ was vapor degreaser
111 TCA 3/90

2. alkaline wash to remove oil SAA
2.5 gal pail
concrete no dike
3/90

3. old vapor degreaser area

4. $NaNO_3$ deburr on floor stuff

5. scrap coolant SAA goes to oil recov PZ

6. centrifuge to recover oil

7. scrap oil + stoddard solvent SAA
on concrete no dike

8. new oil SE corner

9. scrap grinding + dust collector
used to collect metal dust
vacuum system w/filter

10. Chemical storage area
for product - floor drains
are blocked off

11. Plating chemical storage area

12. new hazwaste storage area. 6 x 10 drums each self contained on asphalt - 220 gal capacity for spill - ventilated outside

Note: above USTs in PZ

13. ~~Elec~~ plating line
~~Cyanide waste~~
Zn plating alk zinc wash
3 Zn tanks
2 rinse

14. Zn filters replaced 1-wk
floor is graded-sumped to OWPT
water rinse goes to OWPT also (was the gold plating line)
- ventilation to roof

15. Zn filter DSAA on concrete nodules

16. Ni/Cr. plating lines = 3
Ni - Cr^{+3} - Cr^{+6} dip
2 tanks
~~KOH~~ - overflow to cent.
⇒ waste oil

e. rinses x2 f. NaOH
g. rinses x2 h. acid-Ni
i. rinse j. plate Ni
k. 2 rinses → to evaporators recovers Ni: recycles di water
l. Cr^{+3} m. rinse
n. Cr^{+6} acid dip
Cr wastes go to Cr^{+6} reducing others sep

17. Ni filter on tank
Cr filter on tank
stored in SAA
18. Trump oil and alkali from centrifuge → concrete no dike

Note: was ZnCN
Most floor trenched
→ was spill area

19. another oil sep centrifuge
Trump oil and alkali
on concrete not diked

Note: oil dry on floor
to catch plating dripping
disposed of w/ oil sep
sludge

20. Ni filter centrifuge
collection drum for
#3 plater SAA
on concrete diked

21. WWPT
- get detailed description
- have batch tanks for spills

22. Ni evaporater coming diked

23. sludge dryer from filter press then to it

24. DSAA for dryer then to rolloff on concrete no dike

25. rolloff container for sludge concrete no dike. covered 6/24/91

26. machine area will have DSAA not presently - goes to other building via to die laser cutters

27 scrap oil collection drum SAA from punch presses hydraulic fluid collection pits under larger units.

28 rotofinish deburring area. alkaline in tank water to plating WWPT X2 trench collects WW

22

29 Waste oil from truck parts added to other waste oil streams - analysis

30 N. strip area → WW to PT plant diked on concrete

31. plastic injection molding area Lexan, Cyco lac recycled waste oil in trays underneath - area trenched

23

32. IPA parts washer solids waste in SAA in corner of plastics area

Note: compressor room generates W-oil

33. WWPT plant for parts washers and painting operations discharge to sewer

34. Filter cartridges neutralized - gaylord box mixed w/ neutralized paint sludge SAA + machine shop

35. mixing room for paint room collected in DSAA diked room on concrete

36. (4) PQ(2) parts washer cleaner (1) (3) Rinse

37. Oil skimmer gets oil → oil separator in P2 SAA

38. Solvent container box N of print shop used to be used on concrete w/o dike solvent blend

— waste gravity fls of solvent

39. Print shop DSAA waste paint/solvents from paint booths electrostatically filters replaced daily ⇒ roll off P2

40. Print chips off print racks w/ neut. print sludge DSAA concrete - no dike

TLP nonhaz

41. 5 Stoddard solvent washers pans under neath + collect waste in drum.

42. forklift oil wash water collected off tool room to oil separator DSAA

43. stoddard solvent waste also

44. parts washer same as other one for water based oil collection from skimmer DSAA concrete no dike

only paint sludge generates when cleaned cardboard + paint-sludge

45. stoddard collection drum for tool room in cabinet on concrete no dike - trench on bldg

46. scrap oil accumulation area from tool room 3 drums DSAA + machine repair + oil dry

47. gasoline UST at thruway entrance to Q2 no details

48. 4 strip tanks
KOH
2 recycling tanks
are no longer used
waste: paint pigments
in alkali no OSAA
diked curbed to CWWTP2

49. waste solvent
dripping parts after
stripping OSAA
2T on concrete
not diked

50. H_3PO_4 derusting
station trenched
w/air permit

51. product storage solvent
tank UST was
removed. Same mix
as in paint shop

52. paint strip WWT area
= neutralized paint sludge
get description
stored in gaylord box
on concrete - no dike
was formerly used as
MICA strip area no
spills - waste was
SILICONE waste!

53. parts washer water treatment (neutral.) with filters that go into neut. paint sludge waste stream

54. Oil sep. get into waste oil + sludge scrap oil/water ~~Treatment~~

55. scrap oil/coolant for oil separator 1) 5 staging area

56. 2T paint mixing area - unused now would have been storage area for waste

57. old solvent storage area for paint shop cabinet or concrete

- 3 empty building storage only was once a solvent area used paint shop storage

32

58. 2 scrap of 1 stoddard solvent DSAA for welding area + machine shop area is trenched

59. 1 PA pad printer cleaning SAA dried paint and cloth in Drum

60. rolloff for the non hazardous waste streams closed top on asphalt

33

Note: storm water/noncontact cooling water goes to NPDES Goose Creek

61. Container Storage Area gravel was asphalted when? 122' canopyed liquid bays are trenched

1 2 3 4 5 6 7 8

w end diked sloped to south ON crete/asp. fairly clean

. tank truck pumps out of drums ~40 drums

site operates 24 hours
- 8 hr is most
guards patrol where
plant.
will discontinue waste
acceptance from North
plant.

62 Chemistry Lab
plating wastes
from AA go to
plating treatment system
all analysis for
wastes done here
solvent reduced paint
plating wastes
solvent run to paint shop waste

correcting IEPA requests
for chain of custody

63 old USTs
500 gal toluene
500 gal 'solvent mix
pulled no problems
N. next to raw paint
storage area

64 Paint storage Area
lots of paint spills
but diked cleaned
w 6 months - dead birds
solvent storage on other
side.

ATTACHMENT D

PROCESS DESCRIPTIONS

ACID ZINC CHLORIDE BARREL LINE REV: 07/20/91

CLEANING: AS NEEDED
AIR AGITATION IN ALL TANKS

T-1 ELECTROCLEAN
MAKE UP: 100# UDYPREP 270 (SODIUM HYDROXIDE - 45-55%)
(EDTA - 1%)
VOLUME: 260 GALS. - TANK SIZE - 44"W X 45"L X 30"D
WITH A 6"W X 45"L X 30"D OVERFLOW FOR OIL COLLECTION
TEMPERATURE: 130F; STEAM HEATED AND GUAGE REGULATED (TRERICE)
RECTIFIER: AIR-COOLED; 9 VOLTS, 700 AMP
CONTAMINANTS: OILS AND OXIDES
DESTINATION: SOLIDS, LIQUIDS, AND WASHOUT IS PUMPED TO TA-7
OR TA-2 FOR TREATMENT.

T-2 COLD WATER RINSE (CWR)
VOLUME: 200 GALS. - TANK SIZE - 36"W X 45"L X 30"D
OPERATION: CITY WATER FEED AT 3 GPM: CONTROLLED WITH CONDUCTIVITY
METER.
CONTAMINANTS: OILS, ALKALI DRAG-OUT
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2
DRAIN TO TREATMENT TANK TA-7 OR TA-2

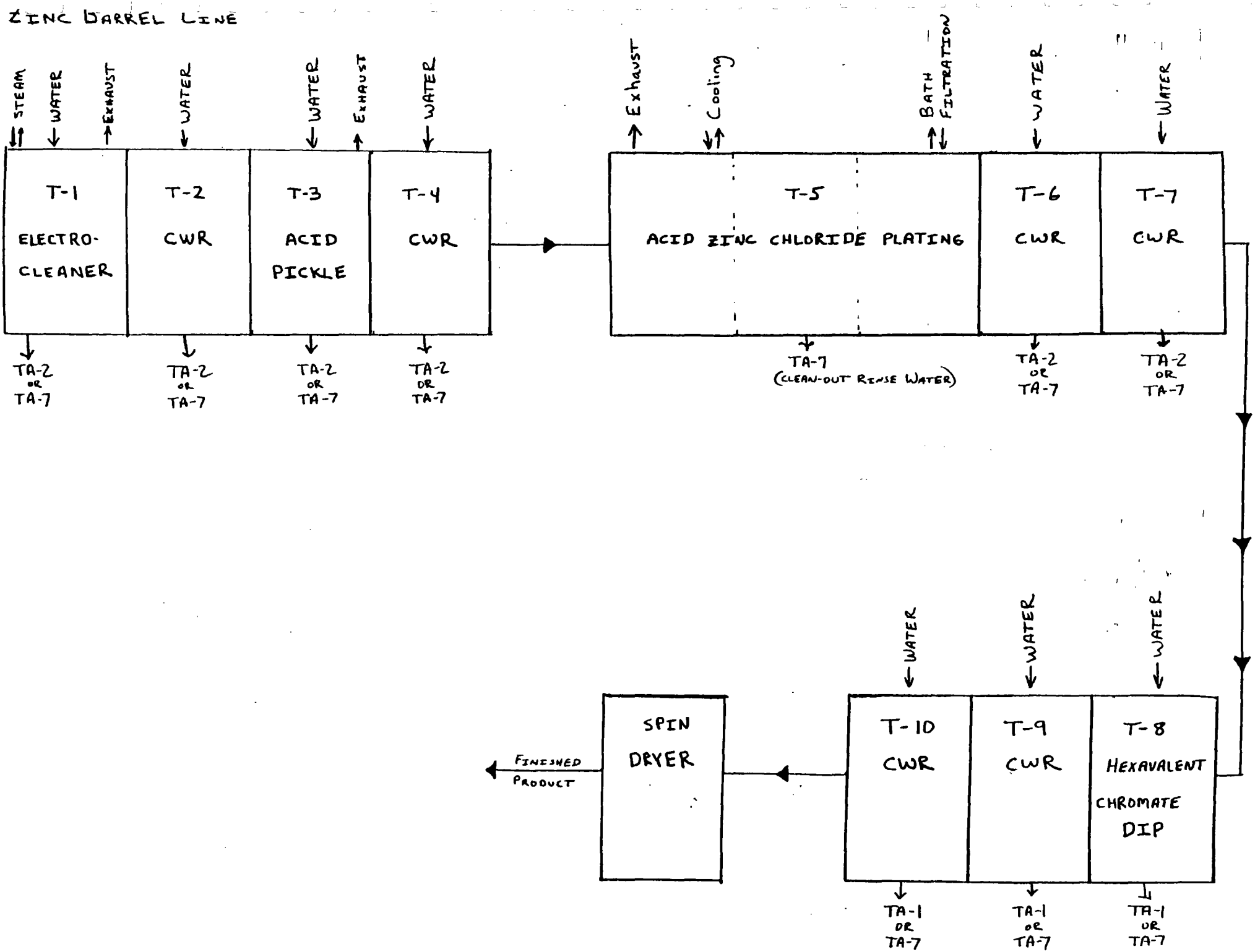
T-3 ACID PICKLE
MAKE-UP: 350# UDYPREP 345 (SODIUM BISULFATE - 95%)
20 GAL. HYDROCHLORIC ACID
VOLUME: 200 GALS - TANK SIZE - 36"W X 45"L X 30"D
DESTINATION: DRAINED TO TREATMENT TA-7 OR TA-2

T-4 COLD WATER RINSE (CWR)
VOLUME: 200 GAL - TANK SIZE - 36"W X 45"L X 30"D
OPERATION: CITY WATER FEED AT 3 GPM; CONTROLLED WITH CONDUCTIVITY
METER.
CONTAMINANTS: ACID DRAG-OUT
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2
DRAIN TO TREATMENT TANK TA-7 OR TA-2

T-5 ACID ZINC CHLORIDE PLATING SOLUTION
VOLUME: 500 GALS - TANK SIZE 108"W X 45"L X 30"D
TEMPERATURE: 70-80F - COOLING WATER CONTROLLED
RECTIFIER: UDYLITE SASSC, 9VOLT, 3000AMP
OPERATION: CHILLER (ALPHA MODEL WCA-5) USED TO MAINTAIN OPTIMUM
PLATING TEMPERATURE.
CONTINUOUS FILTRATION USING BAG FILTER
FILTER UNIT: SUMMIT SCIENTIFIC 8-3-MC5

CHEMICAL CONSTITUENTS:
HYDROCHLORIC ACID
ZINC CHLORIDE (LIQUID)
POTASSIUM CHLORIDE
HYDROGEN PEROXIDE (35%)
SPECTRALYTE 330 (ZINC CHLORIDE - 20%)
(FORMALDEHYDE - .01%)
SPECTRALYTE KX-95
BORIC ACID

ZINC BARREL LINE



THE NICKEL-CHROME PLATING LINES (I.E. PLATERS 1, 2, AND 3) AT THE EUREKA COMPANY ARE IDENTICAL IN PROCEDURE. SLIGHT VARIATIONS HAVE BEEN MADE IN THE CLEANING CYCLE MAKE-UP DUE TO THE FINAL UTILIZATION OF THE PARTS PROCESSED. THE PLATED PARTS' SUBSTRATE IS STEEL. THE TANK'S MAKE-UPS ARE DETAILED IN THE FLOW SHEETS FOR EACH PLATER.

BEFORE THE ELECTROPLATING PROCESS, PARTS ARE FIRST CHEMICALLY PREPARED. BASED ON THE NATURE OF THE SOILS, THE FOLLOWING CYCLE IS USED FOR MAXIMUM CLEANING AND METAL SURFACE PREPARATION.

TANK 1 - SOAK CLEAN

A HOT, AIR AGITATED ALKALINE CLEANER WHICH REMOVES ORGANIC SOILS AND DIRT BOUND TO THE SURFACE BY THE OILS AND GREASES.

TANK 2 - REVERSE ELECTROCLEAN

A HOT, AIR AGITATED ALKALINE CLEANER WHERE THE PART IS MADE CATHODIC (CURRENT APPLIED) WHICH GENERATES A GAS TO LOOSEN SCALE AND SOILS. THE POSITIVELY CHARGES PART WILL REPEL METAL IONS OR SMUT FROM REFORMING ON THE PART.

TANKS 3-4 - RINSING

COUNTERCURRENT WATER FLOW TO REMOVE THE ALKALINE FILM.

TANK 5 - HOT ACID PICKLING

A HOT, ACIDIC SOLUTION THAT REMOVES THE HEAVIER SCALE AND RUST NOT AFFECTED BY ALKALINE CLEANING.

TANKS 6-7 - RINSING

COUNTERCURRENT WATER FLOW TO REMOVE THE ACIDIC FILM.

TANK 8 - REVERSE ELECTROCLEAN

PARTS ARE CLEANED AGAIN TO REMOVE ANY PICKLING SCALE

TANKS 9-10 - RINSING

COUNTERCURRENT WATER FLOW TO REMOVE THE ALKALINE FILM.

TANK 11 - COLD ACID DIP

REMOVES ALKALINE FILM LEFT FROM RINSING AND ACTIVATES METAL SURFACE TO PREPARE FOR NICKEL PLATING.

TANK 12 - RINSING

REMOVES EXCESS ACID SO THAT pH OF THE NICKEL TANK IS NOT ADVERSELY AFFECTED.

TANK 13 - NICKEL PLATING

PARTS ARE PLATED IN A HIGH NICKEL CHLORIDE BATH. THE NUMBER OF

The Eureka Company
July 22, 1991

NICKEL-CHROME PLATER #1
UDYLITE CYCLEMASTER 42, SERIAL-A-2640

CLEANING: SEMI-ANNUAL OR AS NEEDED.
AIR AGITATION ON ALL TANKS.

T-1 SOAK CLEANER
MAKE-UP: 400# C-255 (SODIUM HYDROXIDE- 25%)
VOLUME: 590 GALS - TANK SIZE 88"L X 30"W X 54"D
TEMPERATURE: 190°F; STEAM HEATED AND GAUGE REGULATED (15PSI MAX)
CONTAMINANTS: OILS, OXIDES
DESTINATION: ALKALI OIL REMOVED IN CENTRIFUGE. DRUMMED AND PROPERLY DISPOSED OF AS TRAMP OIL AND ALKALI.
SOLIDS, LIQUIDS, AND WASHOUT PUMPED TO TA-10 OR TA-9 TREATMENT TANK FOR NEUTRALIZATION AND DEWATERING.

T-2 REVERSE ELECTROCLEAN #1
MAKE-UP: 600# E-230 (SODIUM HYDROXIDE- <65%)
25# UDYFIN 931 (NO HAZ INGRED.)
VOLUME: 900 GALS - TANK SIZE 31"L X 30"W X 54"D
TEMPERATURE: 160°F; STEAM HEATED AND GAUGE REGULATED (15 PSI MAX)
RECTIFIER: UDYLITE - SASSC 24TTL-5M012-10, 12 VOLTS, 5000 AMP
SERIAL # 09857
CONTAMINANTS: OILS, OXIDES, ALKALI DRAGOUT.
DESTINATION: SOLIDS, LIQUIDS, AND WASHOUT PUMPED TO TREATMENT TANK TA-9 OR TA-10 FOR NEUTRALIZATION AND DEWATERING.

T-3, T-4 COLD WATER RINSE (CWR)
VOLUME: 140 GALS EACH - TANK SIZE - 21"L X 30"W X 54"D
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL
COUNTERCURRENT FLOW FROM T-4 TO T-3.
WATER SUPPLY CONTROLLED BY CONDUCTIVITY METER.
CONTAMINANTS: OILS, ALKALI DRAGOUT, AND OXIDES.
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2.
DRAIN TO TREATMENT TANK TA-2, OR TA-9, OR TA-10.

T-5 HOT ACID TANK
MAKE-UP: 700# UDYPREP 350 (FLUORIDES - 2-5%)
(SODIUM HYDROGEN SULFATE - 85-95%)
1 GAL UDYFIN 367 (FORMALDEHYDE - .01%)
VOLUME: 377 GALS - TANK SIZE - 57"L X 34"W X 54"D
TEMPERATURE: 140°- 170°F; STEAM HEATED AND GAUGE REGULATED.
CONTAMINANTS: ALKALI SCALE, METALS, AND OXIDES.
DESTINATION: SOLIDS, LIQUIDS, AND WASHOUT PUMPED TO TREATMENT TANK TA-2, OR TA-9, OR TA-10 FOR NEUTRALIZATION AND DEWATERING.

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July 22, 1991

T-13 NICKEL PLATING BATH

VOLUME: 1900 GALS - TANK SIZE - 269.5"L X 30"W X 54"D
TEMPERATURE: 130°F: STEAM HEATED AND GAUGE REGULATED (15 PSI MAX)
RECTIFIER: UDYLITE SASSC, MODEL 2VDV-4M009-410, 9 VOLT, 6000 AMP
SERIAL # 22015
OPERATION: 360 SQ FT PRODUCTION PER HOUR
CONCENTRATED NICKEL RINSE WATER RETURN FROM EVAPORATIVE RECOVERY UNITS
CITY WATER MAKE-UP FOR EVAPORATION.
CONTINUOUS FILTRATION USING DIATOMACEOUS EARTH AND ACTIVATED CARBON - SLIMLINE FILTER SL24-30
CHEMICAL CONSTITUENTS: SULFURIC ACID
HYDROCHLORIC ACID
LIQUID NICKEL CHLORIDE
ELECTROLYTIC NICKEL CHIPS
BORIC ACID
NICKEL BRIGHTENER #63 - FORMALDEHYDE- <.01%
SACCHARIN - 10-25%
NICKEL BRIGHTENER #61 - FORMALDEHYDE- <.01%
NICKEL BRIGHTENER MAGNUM S - SACCHARIN - 5-10%
NIRON LC STABILIZER - POLYHYDROXY ACID- <50%
DESTINATION: TO NICKEL STORAGE TANK FOR TREATMENT AND FILTRATION TO REMOVE ORGANIC CONTAMINATION (BRIGHTENER BREAKDOWN). NICKEL PLATING SOLUTION IS TREATED WITH NICKEL CARBONATE (pH ADJUSTMENT), POTASSIUM PERMAGANATE (OXIDIZER), ACTIVATED CARBON, AND FILTER AID.

NICKEL BAGS ARE LEACHED WITH SULFURIC ACID IN TANK. AFTER RINSING, BAGS ARE THEN PLACED IN 55-GALLON LINED DRUMS. THESE ARE LABELED AND ADDED TO THE ROLL-OFF CONTAINING THE PLATING SLUDGE - F006. PLATING TANK IS CLEANED AND WASHED OUT. FRESH NICKEL BAGS ARE PLACED ON THE BASKETS. THE BAGS ARE SOAKED IN A WEAK SULFURIC ACID SOLUTION (3 GALLONS PER TANK FILLED WITH WATER) IN ORDER TO REMOVE THE SIZING IN THE BAGS.

WASHOUT FROM THE PLATING BATH CAN BE SENT TO TA-2 OR TA-7. THIS IS AT THE WASTETREATMENT OPERATOR'S DISCRETION.

NICKEL PLATING BATH IS RETURNED TO THE TANK VIA FILTRATION. STORAGE TANK IS WASHED OUT AND THE RESIDUALS ARE PUMPED TO TREATMENT TANK TA-7.

T-14, T-15, T-16 COLD WATER RINSES

VOLUME: T-14, T-15: 140 GALS EACH - TANK SIZE - 21"L X 30"W X 54"D
T-16 - SPRAY RINSE ONLY - DRY TANK.
OPERATION: T-15 - CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL OR NICKEL RECOVERY DISTILLATE AT 2 GPM. COUNTERCURRENT FLOW FROM T-15 TO T-14.
T-16 - SPRAY FEED AT 2.5 GPM FOR 12.5 SEC (DOWN CYCLE TIME)

TEMPERATURE: ROOM.
DESTINATION: DRAIN TO TREATMENT TANK TA-1 OR TA-7

T-20 COLD WATER RINSE
VOLUME: 140 GALS - TANK SIZE - 21"L X 30"W X 54"D
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL
CONTAMINANTS: CHROME PLATING DRAGOUT.
DESTINATION: OVERFLOW TO TREATMENT TANK TA-1.
DRAIN TO TREATMENT TANK TA-1, OR TA-7.

T-21 COLD WATER RINSE
VOLUME: 140 GALS. TANK SIZE - 21"L X 30"W X 54"D.
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL.
DESTINATION: DRAIN TO TREATMENT TANK TA-1 OR TA-7.
OVERFLOW TO TREATMENT TANK TA-1.

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NICKEL-CHROME PLATER #2
UDYLITE CYCLEMASTER 42. SERIAL #4997
ELECTRICAL PSO #4998
LOADER PSO #4999
CONVEYOR PSO #5000

CLEANING: SEMI-ANNUAL OR AS NEEDED.
AIR AGITATION ON ALL TANKS.

T-1 SOAK CLEANER
MAKE-UP: 1000# C-255 (SODIUM HYDROXIDE- 25%)
VOLUME: 1250 GALS - TANK SIZE 133"L X 33"W X 60"D
TEMPERATURE: 190°F; STEAM HEATED AND GAUGE REGULATED (15PSI MAX)
CONTAMINANTS: OILS, OXIDES
DESTINATION: ALKALI OIL REMOVED IN CENTRIFUGE. DRUMMED AND PROPERTLY DISPOSED OF AS TRAMP OIL AND ALKALI.
SOLIDS. LIQUIDS. AND WASHOUT PUMPED TO TA-10 OR TA-9 TREATMENT TANK FOR NEUTRALIZATION AND DEWATERING.

T-2 REVERSE ELECTROCLEAN #1
MAKE-UP: 475# E-504 (SODIUM HYDROXIDE- <45%)
25# UDYFIN 931 (NO HAZ INGRED.)
VOLUME: 755 GALS - TANK SIZE 91"L X 33"W X 60"D
TEMPERATURE: 160°F; STEAM HEATED AND GAUGE REGULATED (15 PSI MAX)
RECTIFIER: UDYLITE MODEL 2VDV-6M009-310. 9 VOLT. 6000 AMP
SERIAL # 19973
CONTAMINANTS: OILS. OXIDES. ALKALI DRAGOUT.
DESTINATION: SOLIDS. LIQUIDS. AND WASHOUT PUMPED TO TREATMENT TANK TA-9 OR TA-10 FOR NEUTRALIZATION AND DEWATERING.

T-3, T-4 COLD WATER RINSE (CWR)
VOLUME: 170 GALS EACH - TANK SIZE - 21"L X 33"W X 60"D
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL
COUNTERCURRENT FLOW FROM T-4 TO T-3.
WATER SUPPLY CONTROLLED BY CONDUCTIVITY METER.
CONTAMINANTS: OILS. ALKALI DRAGOUT. AND OXIDES.
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2.
DRAIN TO TREATMENT TANK TA-2. OR TA-9. OR TA-10.

T-5 HOT ACID TANK
MAKE-UP: 700# ACID SALTS #2 (SODIUM FLUORIDES - <10%)
(SODIUM BISULFATE <25%)
2 QTS UDYFIN 367 (FORMALDEHYDE - .01%)
VOLUME: 475 GALS - TANK SIZE - 57"L X 33"W X 60"D
TEMPERATURE: 140°- 170°F: STEAM HEATED AND GAUGE REGULATED.
CONTAMINANTS: ALKALI SCALE. METALS. AND OXIDES.
DESTINATION: SOLIDS. LIQUIDS. AND WASHOUT PUMPED TO TREATMENT TANK TA-2. OR TA-9. OR TA-10 FOR NEUTRALIZATION AND DEWATERING.

VOLUME: 170 GALS - TANK SIZE - 21"L X 33"W X 60"D
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL
CONTAMINANTS: CHROME PLATING DRAGOUT.
DESTINATION: OVERFLOW TO TREATMENT TANK TA-1.
DRAIN TO TREATMENT TANK TA-1. OR TA-7.

T-21 COLD WATER RINSE

VOLUME: 170 GALS. TANK SIZE - 21"L X 33"W X 60"D.
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL
DESTINATION: DRAIN TO TREATMENT TANK TA-1 OR TA-7.
OVERFLOW TO TREATMENT TANK TA-1

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NICKEL-CHROME PLATER #3
UDYLITE CYCLEMASTER III. SERIAL #760701
MACHINE PSO #1254
ELECTRICAL PSO #1255
LOADER PSO #1256
CONVEYOR PSO #1257

CLEANING: QUARTERLY OR AS NEEDED.
AIR AGITATION ON ALL TANKS.

T-1 SOAK CLEANER
MAKE-UP: 1500# C-255 (SODIUM HYDROXIDE- 25%)
VOLUME: 2170 GALS - TANK SIZE 166"L X 41"W X 66"D
TEMPERATURE: 190°F; STEAM HEATED AND GAUGE REGULATED (15PSI MAX)
CONTAMINANTS: OILS, OXIDES
DESTINATION: ALKALI OIL REMOVED IN CENTRIFUGE. DRUMMED AND PROPERLY DISPOSED OF AS TRAMP OIL AND ALKALI.
SOLIDS, LIQUIDS, AND WASHOUT PUMPED TO TA-10 OR TA-9 TREATMENT TANK FOR NEUTRALIZATION AND DEWATERING.

T-2 REVERSE ELECTROCLEAN #1
MAKE-UP: 875# E-504 (SODIUM HYDROXIDE- <45%)
40# UDYFIN 931 (NO HAZ INGRED.)
VOLUME: 1310 GALS - TANK SIZE 117"L X 41"W X 66"D
TEMPERATURE: 160°F; STEAM HEATED AND GAUGE REGULATED (15 PSI MAX)
RECTIFIER: UDYLITE MODEL 2VDV-4M009-300, 9 VOLT, 4000 AMP
SERIAL # 18153
CONTAMINANTS: OILS, OXIDES, ALKALI DRAGOUT.
DESTINATION: SOLIDS, LIQUIDS, AND WASHOUT PUMPED TO TREATMENT TANK TA-9 OR TA-10 FOR NEUTRALIZATION AND DEWATERING.

T-3, T-4 COLD WATER RINSE (CWR)
VOLUME: 300 GALS EACH - TANK SIZE - 25"L X 41"W X 66"D
OPERATION: CITY WATER FEED AT 2.5-3 GPM FLOW CONTROL
COUNTERCURRENT FLOW FROM T-4 TO T-3.
WATER SUPPLY CONTROLLED BY CONDUCTIVITY METER.
CONTAMINANTS: OILS, ALKALI DRAGOUT, AND OXIDES.
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2.
DRAIN TO TREATMENT TANK TA-2, OR TA-9, OR TA-10.

T-5 HOT ACID TANK
MAKE-UP: 750# ACID SALTS #2 (SODIUM FLUORIDES - <10%)
(SODIUM BISULFATE <25%)
750# UDYPREP 345 (SODIUM HYDROGEN SULFATE 90-95%)
(FLUORIDES - 5-8%)
1 GAL UDYFIN 367 (FORMALDEHYDE - .01%)

WATER SUPPLY CONTROLLED BY CONDUCTIVITY METER.
CONTAMINANTS: OILS, ALKALI DRAGOUT, AND OXIDES.
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2.
DRAIN TO TREATMENT TANK TA-2, OR TA-9, OR TA-10.

T-13 NICKEL PLATING BATH

VOLUME: 4300 GALS - TANK SIZE - 389"L X 41"W X 66"D.
TEMPERATURE: 130°F: STEAM HEATED AND GAUGE REGULATED (15 PSI MAX)
RECTIFIER: UDYLITE SASSC, MODEL 2VDV-8M009-300, 9 VOLT, 8000 AMP.
SERIAL # 18155
OPERATION: 1100 SQ FT PRODUCTION PER HOUR
CITY WATER MAKE-UP FOR EVAPORATION AND CONCENTRATED NICKEL RINSE WATER RETURN FROM EVAPORATIVE RECOVERY UNITS.
CONTINUOUS FILTRATION USING DIATOMACEOUS EARTH AND ACTIVATED CARBON - SLIMLINE FILTER SL24-30
CHEMICAL CONSTITUENTS: SULFURIC ACID
HYDROCHLORIC ACID
LIQUID NICKEL CHLORIDE
ELECTROLYTIC NICKEL CHIPS
BORIC ACID
NICKEL BRIGHTENER #63 - FORMALDEHYDE- <.01%
SACCHARIN - 10-25%
NICKEL BRIGHTENER #61 - FORMALDEHYDE- <.01%
NICKEL BRIGHTENER MAGNUM S - SACCHARIN- 5-10%
NIRON LC STABILIZER - POLYHYDROXY ACID- <90%
DESTINATION: TO NICKEL STORAGE TANK FOR TREATMENT AND FILTRATION TO REMOVE ORGANIC CONTAMINATION (BRIGHTENER BREAKDOWN). NICKEL PLATING SOLUTION IS TREATED WITH NICKEL CARBONATE (pH ADJUSTMENT), POTASSIUM PERMAGANATE (OXIDIZER), ACTIVATED CARBON, AND FILTER AID.

NICKEL BAGS ARE LEACHED WITH SULFURIC ACID IN TANK. AFTER RINSING THESE BAGS ARE THEN PLACED IN 55 GALLON LINED DRUMS. THESE ARE LABELED AND ADDED TO THE ROLL-OFF CONTAINING THE PLATING SLUDGE -F006. TANK IS WASHED AND CLEANED OUT. FRESH NICKEL BAGS ARE PLACED ON THE BASKETS. THE BAGS ARE SOAKED IN A WEAK SULFURIC ACID SOLUTION (3 GALLONS PER TANK FILLED WITH WATER) IN ORDER TO REMOVE THE SIZING IN THE BAGS.

WASHOUT FROM THE PLATING BATH CAN BE SENT TO TA-2 OR TA-7. THIS IS AT THE WASTETREATMENT OPERATOR'S DISCRETION.

NICKEL PLATING BATH IS RETURNED TO THE TANK VIA FILTRATION. STORAGE TANK IS WASHED OUT AND THE RESIDUALS ARE PUMPED TO TREATMENT TANK TA-7.

T-14, T-15, T-16 COLD WATER RINSES

The Eureka Company
July 22, 1991

Nickel Strip

Cleaning: As needed
Dresser Roots Blower 36AF providing air agitation in all tanks.

T-1 CHROME STRIP
MAKE UP: 60# UDYPREP (SODIUM HYDROXIDE 45-55%)
(EDTA 1%)
10# UDYFIN 931
VOLUME: 200 GAL - TANK SIZE 36"L X 36"W X 36"D WITH AN OVERFLOW TROUGH 3"L X 36"W X 5"D
TEMPERATURE: 140-160F: STEAM HEATED AND REGULATED (TRERICE) COIL IS TRANTER PLATECOIL 60AD
ANODES: STEEL - 3" X 3/8" X 30"
RECTIFIER: DUAL-O-MATIC, AIR COOLED, 6 VOLT, 1500 AMP
EXHAUST: PVC EXHAUST HOOD AND DUCT CONNECTED TO BUFFALO TYPE B VANEAXIAL FAN, SIZE 18
OPERATION: TO STRIP CHROME FROM PLATING REJECTS
DESTINATION: SOLIDS, LIQUIDS, AND WASH-OUT PUMPED TO TREATMENT TANK TA-7

T-2 COLD WATER RINSE (CWR)
VOLUME: 80 GAL - TANK SIZE 24"L X 24"W X 30"D
OPERATION: CITY WATER FEET AT 2.5-3 GPM FLOW CONTROL
CONTAMINANTS: ALKALI DRAG OUT
DESTINATION: OVERFLOW TO TREATMENT TA-2
DRAIN TO TREATMENT TA-7

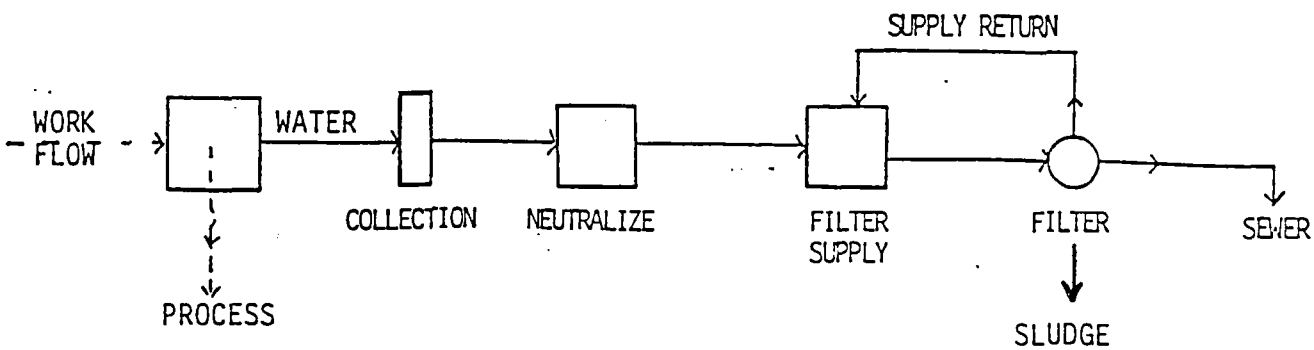
T-3 ACID ACTIVATION
MAKE UP: 100# ACID SALTS #2 (SODIUM FLUORIDE <10%)
(SODIUM BISULFATE >90%)
VOLUME: 80 GAL - TANK SIZE 24"L X 34"W X 30"D
TEMPERATURE: ROOM
ANODES: 1" X 4" X 24" CARBON, WITH 4" TITANIUM HOOK
RECTIFIER: RAPID ELECTRIC, AIR COOLED, 6 VOLT, 250 AMP
EXHAUST: PVC HOOD AND DUCT COMMON TO EXHAUST ON T-1
OPERATION: TO ACTIVATE NICKEL SURFACE FOR STRIPPING
DESTINATION: SOLIDS, LIQUIDS AND WASH OUT PUMPED TO TREATMENT TANK TA-7

T-4 COLD WATER RINSE (CWR)
VOLUME: 80 GAL - TANK SIZE 24"L X 24"W X 30"D
OPERATION: CITY WATER FEED AT 3 GPM FLOW CONTROL
ALSO FUNCTIONS AS COOLING STATION FOR NICKEL STRIPPING SOLUTION. SOLUTION IS PUMPED VIA AIR PUMP THROUGH TRANTER PLATECOIL (18"W X 29"L - 16 GUAGE STAINLESS STEEL TYPE 70AD). NON-CONTACT COOLING.
CONTAMINANTS: ACIDIC DRAG-OUT
DESTINATION: OVERFLOW TO TREATMENT TANK TA-2
DRAIN TO TREATMENT TANK TA-7

T-5 NICKEL STRIP

PARTS WASHER 131

RINSE WATERS AT A THREE STAGE IRON PHOSPHATE PARTS WASHER AND ALKALINE PARTS WASHER ARE DISCHARGED TO THE TREATMENT CENTER. WATERS ENTER A COLLECTION TANK WHICH OVERFLOWS INTO A TREATMENT TANK. THE pH IS ADJUSTED TO A RANGE OF 7 TO 8 WITH EITHER A 10% CAUSTIC SODA SOLUTION OR A 10% SULFURIC ACID SOLUTION. AFTER NEUTRALIZATION THE WATER IS SENT TO A FILTER SUPPLY TANK. WATER IS DRAWN FROM THIS TANK THROUGH A CARTRIDGE FILTER AND CAN BE SENT BACK TO THE FILTER SUPPLY TANK TO MAINTAIN WATER VOLUME FOR FILTERS OR DISCHARGE DIRECTLY TO SANITARY SEWER. PARTS WASHER CLEAN OUTS ARE TREATED IN THE SAME PROCEDURE. SLUDGE AND FILTER MATERIAL IS LANDFILLED OFF-SITE AS A NON-HAZARDOUS. NEUTRALIZED SLUDGE.



ATTACHMENT E

MATERIAL SAFETY DATA SHEETS AND WASTE ANALYSES

MATERIAL SAFETY DATA SHEET

I - PRODUCT IDENTIFICATION

COMPANY NAME: Calgon Vestal Laboratories

ADDRESS: 5035 Manchester Avenue
St. Louis, MO 63110

Tel No: (314)535-1810
Nights: (314)862-2000
CHEMTREC: (800)424-9300

PRODUCT NAME: RP-775

Product No.: 1809

Synonyms: Alkaline Corrosion Inhibitor/Cleaner

II - HAZARDOUS INGREDIENTS OF MIXTURES

MATERIAL:	(CAS#)	(ORAL LD50)	% By Wt.	TLV	PEL
#2-Butoxyethanol	(111-76-2)	(470mg/kg)	<10	25ppm STEL: 75ppm	25ppm (skin) HSTC
Sodium Nitrite	(7632-00-0)	(85mg/kg)	<5	N/AV	N/AV HS
Potassium Hydroxide	(1310-58-3)	(365mg/kg)	<5	2mg/m3 (ceiling)	2mg/m3 (ceiling) HS
Sodium Tetraborate, Decahydrate	(1303-96-4)		<5	5mg/m3	10mg/m3

Ingredient subject to reporting under Section 313 of Title III (SARA) and 40 CFR 372.

III- PHYSICAL DATA

Vapor Pressure, mm Hg: Undetermined
Evaporation Rate(ether=1): N/A
Solubility in H2O: Complete
Freezing Point F: N/A
Boiling Point F: > 212
Specific Gravity H2O=1 @25C: 1.115

Vapor Density (Air=1)60-90F: Undeter
% Volatile by wt <5
pH @ Solution N/A
pH as Distributed: 13.4
Appearance: Clear pale light straw liq
Odor: Mild chemical odor

IV - FIRE AND EXPLOSION

Flash Point F: N/A

Flammable Limits: N/A

Extinguishing Media: Product is not flammable or combustible.Use media appropriate for the primary source of fire.

Special Fire Fighting Procedures: Use caution when fighting any fire involving chemicals.A self-contained breathing apparatus is essential.

Unusual Fire and Explosion Hazards: None known

V - REACTIVITY DATA

Stability - Conditions to avoid: None known

Incompatibility: Strong acids

Hazardous Decomposition Products: Carbon monoxide,carbon dioxide and oxides of nitrogen may be released in a fire.

Conditions Contributing to Hazardous Polymerization: Product will not polymerize.

(Cont'd on Page 2)

MATERIAL SAFETY DATA SHEET
For Materials Provided

OSHA

Section I - Product Identification 4/4/86

Provider: AMERICAN CHEMCO INDUTRIES, INC.
675 East Irving Park Road, Suite 305
Roselle, Illinois 60172

Information Phone: (312)894-4433
Emergency Phone: (312)577-5045

Product Class:
Trade Name : EP-89 Hot Strip
Product Code :
C.A.S. No. : NA-1719

Hazard Rating: none->extreme 0-->4
Corrosive Material

Health:
Fire :
Reactivity:

Section II - Hazardous Ingredients

Ingredients:	CAS#	Weight %	Exposure Limits	Vapor Pr. mm Hg
Potassium Hydroxide	1310-58-3	< 30	2.0 mg/m^3 for 15 min. (PEL) OSH 2.0 mg/m^3 for AIR BORNE (TLV) Acute LD_{50}=365 mg/kg (ORAL RAT)	
Dipropylene Glycol		< 20	TLV-Not Established Acute LD_{50} 14.8 g/kg (ORAL RAT) Acute LD_{50} > 2 kg/mg (DERMAL) Acute LD_{50} > 200 mg/l in 1 hr (inhalation)	

Section III - Physical Data

Boiling Range: > 200°F
Evap. Rate : (Butyl Acetate=1) ≐ 0.36
Volatiles by volume: ≐ 4.0
Solubility in water: Complete
Appearance: Colorless, Odorless Liquid

Vapor Density: (air=1) >1
Liquid Density: (mmHg) ≐ 8
Wgt. Per Gallon: (Water=1) ≐ 1.26
pH: 10% Solution > 12

Section IV - Fire and Explosion Hazard Data

Flammability Class: None Flash Point: None LEL;
--EXTINGUISHING MEDIA: Usual media

--SPECIAL FIREFIGHTING PROCEDURES: Wear full protective equipment and clothing.

--UNUSUAL FIRE AND EXPLOSION HAZARDS: This product will react with aluminum, zinc, ti and their alloys to produce flammable hydrogen gas.

Section V - Health Hazard Data

--PERMISSIBLE EXPOSURE LEVELS:

--EFFECTS OF OVEREXPOSURE: Eyes: Can cause chemical burns, severe. May produce irreversible damage and blindness. Skin: Can cause severe chemical burns. Ingestion: Can cause gastrointestinal damage. Inhalation: Inahiling mist from this product may produce nasal and respiratory damage.

—EYE PROTECTION: Do Not Wear contact lenses. Wear OSHA approved chemical splash goggles (with face shield as needed).

—ADDITIONAL PROTECTIVE OR HEALTH EQUIPMENT

Section IX - Special Precautions

—PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Strong liquid alkaline product, containing caustic alkali. Causes severe burns to skin and eyes. Do not allow contact with skin, eyes, clothing. Do not take internally. Do not inhale mist, dust, or spray. Do not contact acids. When handling, wear safety goggles or face sield and rubber gloves as well as protective clothing and respirator if necessary.

Store in cool dry place, in original container with lid tightly closed. DO NOT CUT, OTHER INFORMATION: MUTILATE, WELD, OR REUSE THIS CONTAINER FOR ANY PURPOSE. FOR INDUSTRIAL USE ONLY. KEEP AWAY FROM CHILDREN.

MATERIAL SAFETY DATA SHEET
For Materials Provided

OSHA
5/9/86

Section I - Product Identification

Provider: AMERICAN CHEMCO INDUTRIES, INC.
675 East Irving Park Road, Suite 305
Roselle, Illinois 60172

Information Phone: (312)894-4433
Emergency Phone: (312)577-5045

Product Class: listed as Chemco 15
Trade Name : #15 Rust Preventative
Product Code :
C.A.S. No. : 64742-47-8

Hazard Rating: none->extreme 0-->4
Health:
Fire :
Reactivity:
Combustible Liquid, Irritant

Section II - Hazardous Ingredients

Ingredients:	CAS#	Weight %	Exposure Limits	Vapor Pr. mm Hg
Mineral Spirits	64742-47-8	90%	100 ppm (ACGIH) 500 ppm (OSHA)	
Butyl Carbitol	112-34-5	5%	N/E	

Section III - Physical Data

Boiling Range: 365° - 394° F.
Evap. Rate : (BAc=1) Slower
Volatiles by volume: 90%
Spec. Gravity: .78
Solubility in Water: None
Vapor Density: (air=1) Heavier
Liquid Density:
Wgt. Per Gallon:
Appearance: Low viscosity Amber Liquid, Mild Solvent Odor

Section IV - Fire and Explosion Hazard Data

Flammability Class: Volatile Flash Point: 110°F(COC) LEL;
--EXTINGUISHING MEDIA: Carbon Dioxide, Dry Chemical, Water Fog (mist)

--SPECIAL FIREFIGHTING PROCEDURES: Use water to cool exposed containers.

--UNUSUAL FIRE AND EXPLOSION HAZARDS:

Section V - Health Hazard Data

--PERMISSIBLE EXPOSURE LEVELS:

--EFFECTS OF OVEREXPOSURE: Eyes: Causes eye Irritation. Skin: Defatting and irritation after prolonged contact. Inhalation: Nausea, Breathing difficulties in area with concentrations above TLV.

—EYE PROTECTION: Goggles

—ADDITIONAL PROTECTIVE OR HEALTH EQUIPMENT Eye Wash, Safety Shower

Section IX - Special Precautions

—PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Store in cool, dry area away from igniition sources.

OTHER INFORMATION:

Don Jenkins

063 ***

6/2/88

MATERIAL SAFETY DATA SHEET

REV: 04/21/88

CHEMTECH INDUSTRIES, INC.
1655 DES PERES ROAD
P.O. BOX 31000
ST. LOUIS, MO 63131
PHONE: (314) 966-9900

PROD F199
MASTER

HEALTH = 2 REACTIVITY = 0
FIRE = 3 EQUIPMENT = _

HAZARD RATINGS : 0 = LEAST 1 = SLIGHT
2 = MODERATE 3 = HIGH
4 = EXTREME

SECTION I ========== PRODUCT DESCRIPTION ==========

PRODUCT NAME: F 199

SYNONYMS: SOLVENT

CHEMICAL FAMILY: NOT APPLICABLE

SECTION II ========== PRODUCT COMPOSITION ==========

INGREDIENT	CAS #	TLV
ALIPHATIC PETROLEUM NAPTHA	64742-89-8	300 PPM
ISOPROPANOL	67-63-0	400 PPM
2-BUTOXY ETHANOL : Butyl Cellosolve	111-76-2	25 PPM
METHYL ISOBUTYL KETONE HSTC RQ 5000 TQ -	108-10-1	50 PPM

SECTION III ========== PHYSICAL PROPERTIES ==========

BOILING RANGE: 82-170C / 180-338F

SPECIFIC GRAVITY (WATER=1): 0.791

VAPOR PRESSURE AT 20C (MM OF HG): 21.8

VAPOR DENSITY (AIR=1): 3.2

SOLUBILITY IN WATER: APPRECIABLE

EVAPORATION RATE (N-BOAC=1): 1.9

% VOLATILES: 100

APPEARANCE AND ODOR: CLEAR, COLORLESS LIQUID WITH A TYPICAL THINNER ODOR

SECTION IV ========== FIRE AND EXPLOSION DATA ==========

LOWER FLAMMABILITY LIMITS (% IN AIR): 1.5

FLASH POINT (AND METHOD): (TCC) 57 F

WASTE DISPOSAL PROCEDURES:
INCINERATE PER LOCAL, STATE AND FEDERAL POLLUTION REGULATIONS

SECTION VIII ========== SPECIAL PROTECTION INFORMATION ==========

RESPIRATORY PROTECTION: A NIOSH-APPROVED RESPIRATOR FOR ORGANIC MATERIALS

LOCAL EXHAUST: RECOMMENDED

PROTECTIVE GLOVES: SOLVENT RESISTANT SUCH AS VINYL OR NEOPRENE

EYE PROTECTION: CHEMICAL SAFETY GOGGLES

OTHER PROTECTIVE EQUIPMENT: EYE-WASH, SAFETY SHOWER, PROTECTIVE CLOTHING

SECTION IX ========== ADDITIONAL PRECAUTIONS ==========

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
DANGER! HARMFUL IF SWALLOWED! FLAMMABLE!
KEEP AWAY FROM HEAT AND OPEN FLAME. USE ONLY WITH ADEQUATE VENTILATION
AVOID PROLONGED BREATHING OF VAPOR OR SPRAY MIST. AVOID PROLONGED OR
REPEATED CONTACT WITH SKIN. KEEP CONTAINER CLOSED WHEN NOT IN USE.
FOR INDUSTRIAL USE ONLY!

OTHER PRECAUTIONS:
DO NOT STORE ABOVE 49C (120F). STORE LARGE AMOUNTS IN STRUCTURES MADE FOR FLAMMABLE LIQUIDS. EMPTY CONTAINER HAZARDOUS. CONTINUE ALL LABEL PRECAUTIONS. DO NOT FLAME CUT, BRAZE OR WELD.

80918 - R2271 (RUN 06/20/91)

PREQUALIFICATION EVALUATION
CUSTOMER SURVEY

COMPLETE: 06/20/91
CONTROL#: 0099216-8
SAMPLE# : 202591

safety-kleen

ACCEPT

FLUID RECOVERY

NO ATTACHMENT

** FLUID RECOVERY **

CUSTOMER INFORMATION: 5136-01-9049

EUREKA
1201 E BELL
BLOOMINGTON IL 61701

ATTN: DON JENKINS

BRANCH: 513601 ROGER BROTHERTON
NATURE OF BUSINESS: MFG OF VACUUMS
FEDERAL EPA ID: ILD001163823 STATE EPA: IL. ID: 1130900009 ID:
MANIFEST ADDRESS IS FACILITY MANIFEST TO SIC #: 3633

MATERIAL: PAINT WASTE PROCESS: PAINTING
VOLUME: 2200 GALS PER QUARTER VOLUME ON HAND: 2750
STORAGE CAPACITY: 0 IN DRUMS SHIPPING FREQUENCY: QTRLY IN DRUMS
COLOR: BLUISH/GRAY LAYERS: TWO PHYSICAL STATE: LIQUID VISCOSITY: LOW

MATERIAL COMPOSITION(VOL%):	CODE	MIN	MAX	TYPICAL
PAINT WASTE		0.0		100.0
XYLENE		0.0		

RESTRICTED SUBSTANCES: NONE
D.O.T. HAZARDOUS MATERIAL: CUSTOMER REQUEST ASSISTANCE
EPA HAZARDOUS WASTE: CUSTOMER REQUEST ASSISTANCE

P.O. NO: BRANCH: 513601 DATE: 05/30/91
TYPE OF SAMPLE: COMPOSITE NUMBER OF DRUMS SAMPLED: 4 TAKEN BY: SALESREP
CONTACT: DON JENKINS TITLE: ENGINEER PHONE: 309-823-5461
SURVEY COMMENTS: ANALYZE AT ELK GROVE
L#12086-6

CORPORATE REVIEWS:	DISPOSITION	REVIEWER	DATE
TECHNICAL:	ACCEPT	JHP	06/18/91
REGULATORY:	ACCEPT	AAD	06/18/91
OPERATING:	ACCEPT	JWH	06/18/91

PRICING CODE: F1

APPROVED FACILITIES:

(658) SAFETY-KLEEN CORP	(654) SAFETY-KLEEN CORP
STATE HWY 146	633 EAST 138TH ST
NEW CASTLE KY 40050	DOLTON IL 60419
FED EPA#: KYD053348108	ILD980613913
STATE EPA#:	0310690006
TELEPHONE: 502/845-2453	708/849-4850
STATE CODE:	000161

EPA WASTE CODES
F003 D001

APPROVD 0000537 DRUM
DOT-EPA DESC. WASTE FLAMMABLE LIQUID, N.O.S. (METHYL ISOBUTYL KETONE) UN1993 (F003)(ERG #27)
COMMENTS: OK FOR FUEL. FRS PART 82101.

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

SAFETY-KLEEN CORP.
PREQUALIFICATION EVALUATION
MATERIAL ANALYSIS

COMPLETE: 06/20/91
CONTROL#: 0099216-8
SAMPLE# : 202591

ACCEPT

FLUID RECOVERY
EUREKA

NO ATTACHMENT

** FLUID RECOVERY **

LABORATORY REVIEW:	A		TRACKING INFORMATION:	DATE	FACILITY
LEVEL:	SEG CODE:	RELEASED: 06/20/91	SURVEY RECEIVED :	06/03/91	SK TECHNICAL CEN
LAB REVIEWERS:	AJ AJ	ANALYZED: 06/17/91	SAMPLE RECEIVED :	06/03/91	
			RESAMPLE SHIPPED :		
			RESAMPLE RECEIVED:		

THE ANALYSES CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.
EPA WASTE CODES FOR LDR: F003 D001
ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC COMPOUND WASTE.

[redacted] [redacted]

Metalworking Lubricants

Paint Pigments & Alkali + Trump oil & Alkali

```
Maintain Existing W-Authorizations / Analysis Entries                manalys

 W-Auth No#:    39806   Shipper-no:  00375 / INA 0359368
Generator #:    G311          Name:  EUREKA COMPANY
   Location:    BLOOMINGTON        IL  61701   Received Date: 02/11/91
Pickup Date:    02/11/91    Carrier/Driver:  COMMERCIAL SEWER
   Material:    WASTE              Gallons:          Pounds: 32,480
Analysis by:    SW
      % Oil:    4            %Water: 82            %Solid: 14
   Lbs/Gal:                Normality:
  Flash PT.:    > 240 F          PH: 10.0      Viscosity:
Oil Characteristics:
---------- WORK/ANALYSIS -- Qty in PPM, * Degree of Detection --------
 Descriptn Quantity    Descriptn Quantity        Descriptn Quantity
 PCB:       ND@1PPM    Barium:    3.636          Cadmium:  0.0000
 Chromium:  0.5461     Lead:      0.0000         Mercury:
 Selenium:  0.9022     Silver:    0.0000         Arsenic:  0.0000
*Halides:   ND         Cyanides:                 Sulfides:
PCB Analysis-no:  T 16-312-4        Metal Analysis-no:  M 31-38
Additional comments:
```

[redacted] [redacted]

Metal Working Lubricants

Paint Pigments and Alkali; Tramp Oil and Alkali

Search Work/Analysis with W-Authorization# sanalys1

W-Auth No#: 36713 Shipper-no: 0359367 /097867
Generator #: G311 Name: EUREKA COMPANY
Location: BLOOMINGTON IL 61701 Received Date: 07/17/90
Pickup Date: 07/17/90 Carrier/Driver: COMM. SEWER / 097867
Material: CAUSTIC Gallons: Pounds: 25,080
Analysis by: CJW
% Oil: %Water: %Solid:
Lbs/Gal: 9.39 Normality: 0.8
Flash PT.: > 240 F PH: 14.0 Viscosity:
Oil Characteristics:

----------- WORK/ANALYSIS -- Qty in PPM. * Degree of Detection --------

Descriptn	Quantity	Descriptn	Quantity	Descriptn	Quantity
PCB:	ND01PPM	Barium:	3.244	Cadmium:	.0000
Chromium:	.4934	Lead:	.1524	Mercury:	
Selenium:	.0250	Silver:	.0000	Arsenic:	.0000
*Halides:	ND	Cyanides:	ND@1PPM	Sulfides:	

PCB Analysis-no: T 15-20-3 Metal Analysis-no: M 24-457
Additional comments:

Daily Analytical Laboratories
7807 N. Pioneer Lane • Peoria, Illinois 61614 Tel. 309-692-5252

Eugene J. Daily, President
Otis E. Michels
John P. Higgins
Walter H. Johansen
Lyn A. Denton
Woodrow C. Chenault, Jr.
Thomas B. Jordan
Philip W. Jacobs

ANALYTICAL & ENVIRONMENTAL ENGINEERING LABORATORY

TO: The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701
ATTENTION: Mr. Ken Winchester

DATE RECEIVED 5-6-80
CLIENT P.O. #
D/A PROJECT # 5183.00
DATE OF REPORT 5-23-80

D/A SAMPLE NO.		0127-17		0127-18		
SAMPLE DESCRIPTION		Paint Pigments in Alkali Top		Paint Pigments in Alkali Bottom		
SAMPLE DATE						
Acids,Volatile Organic	mg/l					
Acidity,(as $CaCO_3$)	mg/l					
Alkal.,P'phthalein	mg/l					
Alkal.,Total,(as $CaCO_3$)	mg/l	130,000		130,000		
Bicarbonates	mg/l					
BOD-5,Total	mg/l					
BOD-5,Soluble	mg/l					
BOD-20,Total	mg/l					
BOD-20,Carbonaceous	mg/l					
BOD-20,Nitrogenous	mg/l					
Bromide	mg/l					
Carbonates	mg/l					
Chloramine,Mono-	mg/l					
Chloramine,Di-	mg/l					
Chloride	mg/l					
Chlorine-Demand	mg/l					
-Comb.Residual	mg/l					
-Free Residual	mg/l					
-Total Residual	mg/l					
Color	Unit					
C.O.D.	mg/l					
Cyanide,Free	mg/l					
Cyanide,Total	mg/l	0.17		0.08		
Dissolved Oxygen	mg/l					
Fluoride	mg/l					
Hardness (as$CaCO_3$)	mg/l					
Nitrogen,Ammonia(as N)	mg/l					
Nitrogen,Kjeldahl(as N)	mg/l					
Nitrogen,Organic (as N)	mg/l					

The Eureka Company
J.N. 5183.00 5-23-80

ANALYTICAL & ENVIRONMENTAL ENGINEERING LABORATORY

[redacted]/A SAMPLE NO.		0127-17		0127-18		
SAMPLE DESCRIPTION		Paint Pigments in Alkali Top		Paint Pigments in Alkali Bottom		
SAMPLE DATE						
Nitrate	mg/l					
Nitrite	mg/l					
Odor,Intensity Index	OII					
Odor,Threshold @ 60°C	TO					
Oils & Grease (Soxhlet)	mg/l					
Oxygen Demand Index	mg/l					
pH	Units	14		14		
Phenols	mg/l					
Phosphate,Total (as P)	mg/l					
Phosphate,Ortho (as P)	mg/l					
Phosphorous (as P)	mg/l					
Sludge Volume Index	Units					
Specific Conductance	umhos					
Solids,Total (103°c)	mg/l					
Solids,Total (180°)	mg/l					
Solids,Total Fixed	mg/l					
Solids,Total Volatile	mg/l					
Solids,Dissolved	mg/l					
Solids,Settleable	ml/l					
Solids,Tot.Suspended	mg/l					
Solids,Volatile Sus.	mg/l					
Solids,Volatile Sus.	%					
Sulfate	mg/l					
Sulfide	mg/l					
Sulfite	mg/l					
Total Organic Carbon	mg/l					
Turbidity	JTU					
% Solids		65%		68%		
Flashppint		>200°F		>200°F		
BACTERIOLOGICAL ANALYSIS						
Coliforms,Total	#/100ml					
Coliforms,Fecal	#/100ml					
Fecal Streptococci	#/100ml					
Pseud.aeruginosa	#/100ml					
Staph.aureus	#/100ml					

mg/l=parts per million

Analysis Certified By: John R. LaPayne

John R. LaPayne, Chief Chemist

Analysis and Testing performed in accordance with procedures described in Standard Methods for the Examination of Water and Waste Water 13th Edition,(1971) A.P.H.A.;ASTM Standards Part 23,."Water,Atmospheric Analysis",(1972),A.S.T.M.; and other equivalent procedures.

Eureka Company
J.N. 5183.00 5-23-80

ANALYTICAL & ENVIRONMENTAL ENGINEERING LABORATORY

D/A SAMPLE NO.		0127-17		0127-18		
SAMPLE DESCRIPTION		Paint Pigments in Alkali Top Dry Wt. Bas.	Soluble Metals 1/100 in 0.1N HOAc	Paint Pigments in Alkali Bottom Dry Wt. Bas.	Soluble Metals 1/100 in 0.1N HOAc	
SAMPLE DATE						
HEAVY METALS ANALYSIS						
Aluminum	mg/l					
Antimony	mg/l					
Arsenic	mg/l	2.5	0.02	2.9	0.016	
Barium	mg/l	1,040	3.3	1,010	3.4	
Beryllium	mg/l					
Bismuth	mg/l					
Boron*	mg/l					
Cadmium	mg/l	32	0.16	48	0.19	
Calcium	mg/l					
Chromium Trivalent *	mg/l					
Chromium Hexavalent*	mg/l					
Chromium Total	mg/l	45	1.1	48	0.55	
Copper	mg/l	160	0.55	120	0.52	
Iron Dissolved	mg/l					
Iron Total	mg/l					
Lanthanum	mg/l					
Lead	mg/l	27	0.07	30	< 0.05	
Magnesium	mg/l					
Manganese	mg/l					
Mercury	ppb	18	0.50	10	0.32	
Nickel	mg/l	27	0.26	24	0.24	
Potassium	mg/l					
Selenium	mg/l	7.4	0.022	13.1	0.022	
Silicon	mg/l					
Silver	mg/l	< 0.30	< 0.03	0.30	< 0.03	
Sodium	mg/l					
Strontium	mg/l					
Sulfur	mg/l					
Tin	mg/l					
Titanium	mg/l					
Tungsten	mg/l					
Vanadium	mg/l					
Zinc	mg/l	130	1.0	98	0.09	

mg/l=parts per million

Analysis Certified By: John R. LaPayne

John R. LaPayne, Chief Chemist

Analysis and Testing performed in accordance with procedures described in Standard Methods for the Examination of Water and Waste Water 13th Edition,(1971) A.P.H.A.;ASTM Standards Part 23, "Water,Atmospheric Analysis",(1972),A.S.T.M.; and other equivalent procedures.

All analysis by Atomic Absorption Spectrophotometry unless otherwise specified.
* Analysis by wet chemistry procedures.

PREQUALIFICATION EVALUATION
CUSTOMER SURVEY

COMPLETE: 06/20/91
CONTROL#: 0099216-8
SAMPLE# : 202591

safety-kleen

ACCEPT

FLUID RECOVERY

NO ATTACHMENT

** FLUID RECOVERY **

CUSTOMER INFORMATION: 5136-01-9049

EUREKA
1201 E BELL
BLOOMINGTON IL 61701

ATTN: DON JENKINS

BRANCH: 513601 ROGER BROTHERTON
NATURE OF BUSINESS: MFG OF VACUUMS
FEDERAL EPA ID: ILD001163823 STATE EPA: IL. ID: 1130900009 . ID:
MANIFEST ADDRESS IS FACILITY MANIFEST TO SIC #: 3633

MATERIAL: PAINT WASTE PROCESS: PAINTING
VOLUME: 2200 GALS PER QUARTER VOLUME ON HAND: 2750
STORAGE CAPACITY: 0 IN DRUMS SHIPPING FREQUENCY: QTRLY IN DRUMS
COLOR: BLUISH/GRAY LAYERS: TWO PHYSICAL STATE: LIQUID VISCOSITY: LOW

MATERIAL COMPOSITION(VOL%):	CODE	MIN	MAX	TYPICAL
PAINT WASTE		0.0		100.0
XYLENE		0.0		

RESTRICTED SUBSTANCES: NONE
D.O.T. HAZARDOUS MATERIAL: CUSTOMER REQUEST ASSISTANCE
EPA HAZARDOUS WASTE: CUSTOMER REQUEST ASSISTANCE

P.O. NO: BRANCH: 513601 DATE: 05/30/91
TYPE OF SAMPLE: COMPOSITE NUMBER OF DRUMS SAMPLED: 4 TAKEN BY: SALESREP
CONTACT: DON JENKINS TITLE: ENGINEER PHONE: 309-823-5461
SURVEY COMMENTS: ANALYZE AT ELK GROVE
L#12086-6

CORPORATE REVIEWS:	DISPOSITION	REVIEWER	DATE
TECHNICAL:	ACCEPT	JHP	06/18/91
REGULATORY:	ACCEPT	AAD	06/18/91
OPERATING:	ACCEPT	JWH	06/18/91

PRICING CODE: F1

APPROVED FACILITIES:

(658)	SAFETY-KLEEN CORP STATE HWY 146 NEW CASTLE KY 40050	(654) SAFETY-KLEEN CORP 633 EAST 138TH ST DOLTON IL 60419
FED EPA#:	KYD053348108	ILD980613913
STATE EPA#:		0310690006
TELEPHONE:	502/845-2453	708/849-4850
STATE CODE:		000161

EPA WASTE CODES
F003 D001

APPROVD 0000537 DRUM
DOT-EPA WASTE FLAMMABLE LIQUID, N.O.S.
DESC. (METHYL ISOBUTYL KETONE) UN1993
(F003)(ERG #27)
COMMENTS: OK FOR FUEL. FRS PART 82101.

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

SAFETY-KLEEN CORP.
PREQUALIFICATION EVALUATION
MATERIAL ANALYSIS

COMPLETE: 06/20/91
CONTROL#: 0099216-8
SAMPLE# : 202591

ACCEPT

NO ATTACHMENT

FLUID RECOVERY
EUREKA

** FLUID RECOVERY **

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR	: GRAY/BLUE
WATER CONTENT	: 1.9 WT%
NON-VOLATILE RESIDUE	: 31.6 WT% DESCRIPTION: SOLID
FLAMMABILITY	: FLASHED AT 140 F BY SETAFLASH
FLAMMABILITY	: FLASHED AT 100 F BY SETAFLASH
PH	: EXTRACT BY METER 5.9
RADIOACTIVITY	: NONE DETECTED

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT:	13800 BTU/LB		ASH UPON COMBUSTION:		1.3 WT%
TOTAL CHLORINE	CL: 0.2 WT%		TOTAL BROMINE	BR: <	0.1 WT%
TOTAL FLUORINE	F : < 0.1 WT%		TOTAL SULFUR	S : <	0.1 WT%

GENERAL COMPOSITION:

	SPECIFIC GRAVITY	VISCOSITY (CENTIPOISE)	GENERAL COMPOSITION BY: APPEARANCE (VOL%)	TOTAL (WT %)
AQUEOUS PHASE (FREE WATER)			0.0	0.0
ORGANIC PHASE (FEEDSTOCK)			100.0	100.0
BOTTOM SLUDGE (SEMISOLIDS)			0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)			0.0	0.0
TOTAL	.930	< 50 CPS	100.0	100.0

SPECIFIC COMPOSITION OF TOTAL SAMPLE

	COMPOSITION OF:	TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT		1.9	1.9
NON-VOLATILE RESIDUE	DESCRIPTION: SOLID	31.6	31.6
VOLATILE ORGANICS BY DIFFERENCE		66.5	66.5
TOTAL		100.0	100.0

VOLATILE ORGANIC COMPOSITION OF ORGANIC PHASE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: NEAT
DETECTION METHODS : FID, FID

COMPOUND NAME	COMPOSITION OF: CODE	CAS NUMBER	VOLATILE ORGANICS (WT%)	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
METHYL ISOBUTYL KETONE	MIBK	108-10-1	65.5	65.5	43.6
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13)	MHC	8030-30-6	6.8	6.8	4.5
ETHYLENE GLYCOL BUTYL ETHER	EGBE	111-76-2	6.7	6.7	4.5
XYLENES (ORTHO-, META-, AND PARA-)	XYLS	1330-20-7	4.5	4.5	3.0
LOW-BOILING ALIPHATIC HYDROCARBONS (C5-C8)	LHC	64741-89-5	4.2	4.2	2.8
BUTYL ALCOHOL, ISO-	IBA	78-83-1	3.4	3.4	2.3
METHYL ALCOHOL	MEOH	67-56-1	3.2	3.2	2.1
TOTAL OTHERS (<1.0% EACH)	TO	0-05-5	2.2	2.2	1.5
ACETONE	ACE	67-64-1	2.1	2.1	1.4
ETHYLBENZENE	ETB	100-41-4	1.4	1.4	0.9
TOTAL			100.0	100.0	66.5

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WT%:

ALCOHOLS	6.6	ALIPHATIC HYDROCARBONS	11.0
AROMATIC HYDROCARBONS	5.9	CHLORINATED SOLVENTS	
ESTERS		ETHERS	
GLYCOL ETHERS	6.7	INHIBITORS	
KETONES	67.6	NITROGEN COMPOUNDS	

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

ADDITIONAL ANALYTICAL INFORMATION: IBA 1.9% BY ESTD%.

SAFETY-KLEEN CORP.
PREQUALIFICATION EVALUATION
MATERIAL ANALYSIS

COMPLETE: 06/20/91
CONTROL#: 0099216-8
SAMPLE# : 202591

ACCEPT

NO ATTACHMENT

FLUID RECOVERY
EUREKA

** FLUID RECOVERY **

LABORATORY REVIEW:	A				
LEVEL:	SEG CODE:	RELEASED:	06/20/91		
LAB REVIEWERS:	AJ AJ	ANALYZED:	06/17/91		

TRACKING INFORMATION:	DATE	FACILITY
SURVEY RECEIVED :	06/03/91	SK TECHNICAL CEN
SAMPLE RECEIVED :	06/03/91	
RESAMPLE SHIPPED :		
RESAMPLE RECEIVED:		

THE ANALYSES CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.
EPA WASTE CODES FOR LDR: F003 D001
ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC COMPOUND WASTE.

Eugene J. Daily, Chairman
John P. Higgins, President
Otis E. Michels, Vice President
James F. Dallmeyer
Laboratory Director

Daily Analytical Laboratories

7807 N. Pioneer Lane • Peoria, Illinois 61615 Tel. 309-692-5252

TO: Eureka Company
1201 E. Bell Street
Bloomington, IL 61701

ATTENTION: Mr. Don Jenkins

DATE RECEIVED 1-7-85
CLIENT P.O. #
D/A PROJECT # 5183.00
DATE OF REPORT 1-11-85

D/A SAMPLE NO.		5007-05	5007-06	5007-07		
SAMPLE DESCRIPTION		Scrap Stoddard	Scrap Solvent Reduced	Scrap Chlorinated Solvent		
SAMPLE DATE		1-2-85	1-2-85	1-2-85		
Flashpoint	°F	92	73	185		
% Solids	%	7.4	11	2.7		
Cyanide	mg/kg	<0.13	0.54	< 0.09		
pH *	Units	6.3	6.0	5.0		
Sulfide	mg/kg	<10	< 10	< 10		
Phenol	mg/kg	9.6	2.6	9.5		
E.P. TOXICITY						
Arsenic	ug/1	280	59	98		
Barium	ug/1	24,000	< 2,100	< 2,100		
Cadmium	ug/1	700	< 240	270		
Chromium	ug/1	<240	< 240	< 240		
Lead	ug/1	5,700	< 440	< 440		
Mercury	ug/1	120	<12	36		
Selenium	ug/1	<15	< 15	< 15		
Silver	ug/1	< 240	< 240	< 240		

abbreviated report sheet
*10% Mixture in DDI Water.
ug/1 = parts per billion
1,000 ug/1 = 1 mg/1

Analysis Certified By: John R. LaPayne

John R. LaPayne, Chief Chemist

Analysis and Testing shall be performed in accord with U.S. EPA's current manual of practice or with other procedures acceptable to U.S. EPA and IEPA.

PDC Laboratories, Inc.

...3449 Southport Rd. • Peoria IL 61615
309 ... 4893

ANALYTICAL REPORT FORM

To: The Eureka Company
1201 East Bell Street
Bloomington, IL 61701

Attn: Don Jenkins

Sales Rep
Sample
PDC # 806198
Date Received 06-24-88
Permit #
Date of Report 08-04-88
P.O. # 54453

Waste Stream Neutralized Paint Sludge

Odor Slight
Color Gray
Bulk Density 1,350 lb/yd^3
pH (neat); 9.9 (10% solution)
Flashpoint >200 ^{o}F
% Solids 69

Physical State Solid
Number of Phases 1
Water Reactivity None
Paint Filter Pass
Load Bearing Capacity (ton/sq.ft.)
Leachable Cyanide mg/l

	Totals (mg/kg)	EP Toxicity (mg/l)
Aluminum		
Antimony		
Arsenic	<2.5	<0.5
Barium	260	<10
Cadmium	4.3	0.2
Chromium (Total)	25	0.5
Chromium (Hex.)		<0.05
Copper		
Iron		
Lead	53	<0.5
Manganese		
Mercury	0.023	
Nickel		
Selenium	6.7	<0.10
Silver	<2.5	<0.5
Zinc		

	(mg/kg)
Acidity	
Alkalinity	
Cyanide (Total)	<0.31
Cyanide (Reactive)	
EOX	<20
Oil & Grease	
Phenol (Total)	4.6
Sulfide (Total)	<0.53
Sulfide (Reactive)	
TOC	

(1) Run according to Illinois Pollution Control (6/84) Section 729.320/321.

John R. LaVoie
Laboratory Manager
PDC Laboratories, Inc.

John R. Davis
Quality Assurance Officer
PDC Laboratories, Inc.

Analyses conducted utilizing USEPA, IEPA or other recognized methods.

PDC Laboratories, Inc.

CLIENT The Eureka Co.
DATE RECEIVED 09-17-90
DATE OF REPORT 09-21-90
SAMPLE DESCRIPTION Neutral Paint Sludge

P.O. NUMBER 44148
LAB NUMBER 90090539

LAB NUMBER	ANALYSIS	RESULTS
90090539	TCLP Arsenic	<0.05 mg/l
	Barium	0.5 mg/l*
	Cadmium	0.03 mg/l*
	Chromium	0.03 mg/l*
	Lead	<0.25 mg/l*
	Mercury	<0.001 mg/l
	Selenium	<0.4 mg/l*
	Silver	0.07 mg/l*
	Arsenic Spike Recovery	76 %
	Barium Spike Recovery	59 %
	Cadmium Spike Recovery	66 %
	Chromium Spike Recovery	66 %
	Lead Spike Recovery	61 %
	Mercury Spike Recovery	119 %
	Selenium Spike Recovery	88 %
	Silver Spike Recovery	71 %
	* Performed by Method of Standard Additions.	

Laboratory Manager by JRD

Quality Assurance Officer

TCLP-Metals:edd

PDC Laboratories, Inc.

CLIENT The Eureka Company
DATE RECEIVED 06-25-90
DATE OF REPORT 07-24-90
SAMPLE DESCRIPTION Neutral Paint Sludge
P.O. NUMBER 44148
LAB NUMBER 90060811

TOXICITY CHARACTERISTIC CONSTITUENTS (TCLP)

COMPOUND	SAMPLE CONCENTRATION mg/l	REGULATORY THRESHOLD mg/l
VOLATILES		
Vinyl Chloride	<0.2	0.2
1,1-Dichloroethene	<0.1	0.7
Chloroform	<0.1	6.0
1,2-Dichloroethane	<0.1	0.5
Carbon Tetrachloride	<0.1	0.5
Trichloroethene	<0.1	0.5
Benzene	<0.1	0.5
Tetrachloroethene	<0.1	0.7
Chlorobenzene	<0.1	100.0
1,4-Dichlorobenzene	<0.1	7.5
2-Butanone (MEK)	<0.2	200.0
BASE/NEUTRALS		
Hexachloroethane	<0.02	3.0
Hexachlorobutadiene	<0.02	0.5
2,4-Dinitrotoluene	<0.02	0.13 *
Hexachlorobenzene	<0.02	0.13 *
Pyridine	<0.02	5.0 *
Nitrobenzene	<0.02	2.0
ACIDS		
2,4,6-Trichlorophenol	<0.02	2.0
2,4,5-Trichlorophenol	<0.1	400.0
Pentachlorophenol	<0.1	100.0
o-Cresol	<0.02	200.0
m,p-Cresol	<0.02	200.0

* If the quantitation limit is greater than calculated regulatory level, the quantitation limit then becomes the regulatory level.

John LaTayne
Laboratory Manager

John R. Davis
Quality Assurance Officer

TCLP-1:edd

Environmental Science & Engineering, Inc.
8901 North Industrial Road Peoria, IL 61615-1589
Phone (309) 692-4422 Fax (309) 692-9364
An IEPA Contract Laboratory

TO: The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701
ATTN: Mr. Dean Shoemaker

REPORT DATE: 11-1-91
DATE RECEIVED: 10-11-91
PROJECT NO.: 591-5249
P.O. NO.: 54177

ESE SAMPLE	---	5047-1	5047-2			
SAMPLE DATE	---	10-10-91	10-10-91			
DESCRIPTION	Quant. Limit	SCOILMAIN OIL	SCCIMCOOL OIL	METHOD NO.	DATE ANALYZED	ANALYST
TCLP Metals, mg/l						
Arsenic	0.50	< 0.50	< 0.50	6010	10-22-91	GRS
Barium	0.10	0.283	1.01	6010	10-22-91	GRS
Cadmium	0.050	< 0.050	< 0.050	6010	10-22-91	GRS
Chromium	0.10	< 0.10	< 0.10	6010	10-22-91	GRS
Lead	0.50	< 0.50	< 0.50	6010	10-22-91	GRS
Mercury	0.0005	< 0.0005	< 0.0005	7471	10-22-91	FWM
Selenium	0.075	< 0.075	< 0.075	6010	10-22-91	GRS
Silver	0.10	< 0.10	< 0.10	6010	10-22-91	GRS
PCBs, mg/kg						
Aroclor-1016	1.0	< 1.0	< 1.0	8080	10-15-91	RDU
Aroclor-1221	1.0	< 1.0	< 1.0	8080	10-15-91	RDU
Aroclor-1232	1.0	< 1.0	< 1.0	8080	10-15-91	RDU
Aroclor-1242	1.0	< 1.0	< 1.0	8080	10-15-91	RDU
Aroclor-1248	1.0	< 1.0	< 1.0	8080	10-15-91	RDU
Aroclor-1254	1.0	< 1.0	< 1.0	8080	10-15-91	RDU
Aroclor-1260	1.0	< 1.0	< 1.0	8080	10-15-91	RDU

Report Approved by: Vickie M. Wynkoop
Vickie M. Wynkoop
Project Manager

SDF/L/11.1

SCRAP OIL - MAIN

Environmental Science & Engineering, Inc.
8901 North Industrial Road Peoria, IL 61615-1589
Phone (309) 692-4422 Fax (309) 692-9364

An IEPA Contract Laboratory

TO: The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701
ATTN: Mr. Dean Shoemaker

REPORT DATE: 11-1-91
DATE RECEIVED: 10-11-91
PROJECT NO.: 591-5249
P.O. NO.: 54177

ESE SAMPLE	---	5047-1	5047-2			
SAMPLE DATE	---	10-10-91	10-10-91			
DESCRIPTION	Quant. Limit	SCOILMAIN OIL	SCCIMCOOL OIL	METHOD NO.	DATE ANALYZED	ANALYST
Other Parameters						
pH, units	-	6.62	6.46	150.1	10-12-91	RAU
Cyanide, Total, mg/l	0.10	< 0.10	< 0.10	9010	10-15-91	KMC
Cyanide, Reactive, mg/l	0.10	< 0.10	< 0.10	9010	10-15-91	KMC
Sulfide, Total, mg/l	4	16	68	9030	10-15-91	KMC
Sulfide, Reactive, mg/l	4	6	43	9030	10-15-91	KMC
Total Solids, mg/l	1.0	95.2	15.4	160.3	10-12-91	RAU
Flash Point, Deg-C	25	> 100	> 100	1010	10-15-91	KMC
Phenols, mg/l	0.050	2.51	1.10	9065	10-21-91	NEB

Report Approved by: Vickie M. Wynkoop
Vickie M. Wynkoop
Project Manager

SDF/L/11.2

Environmental
Science &
Engineering, Inc.

8901 N. Industrial Road
Peoria, Illinois 61615-1589
(309) 692-4422
Fax (309) 692-9364

An IEPA Contract Laboratory

REVISED DATE: 12-23-91
DATE: 11-1-91
DATE RECEIVED: 10-11-91
PROJECT NO.: 591-5249
P. O. NO.: 54177

TO: The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701
ATTN: Mr. Dean Shoemaker

ESE SAMPLE: 5047-1
SAMPLE DATE: 10-10-91
DESCRIPTION: SCOILMAIN OIL

Parameter	TCLP Concentration (mg/l)	Maximum Allowable Concentration (mg/l)
TCLP VOLATILE ORGANIC COMPOUNDS		
METHOD NO.:	8240	
DATE ANALYZED:	10-15-91	
ANALYST:	EPL	
Benzene	< 0.05	0.5
Carbon Tetrachloride	< 0.05	0.5
Chlorobenzene	< 0.10	100.0
Chloroform	< 0.05	6.0
1,2-Dichloroethane	< 0.05	0.5
1,1-Dichloroethylene	< 0.05	0.7
Methyl ethyl ketone	< 0.10	200.0
Tetrachloroethylene	< 0.05	0.7
Trichloroethylene	< 0.05	0.5
Vinyl chloride	< 0.10	0.2
TCLP SEMIVOLATILE ORGANIC COMPOUNDS		
METHOD NO.:	8270	
DATE ANALYZED:	10/29-30/91	
ANALYST:	PEM	
Total Cresols (o + m + p)	< 0.30	200.0
1,4-Dichlorobenzene	< 0.40	7.5
2,4-Dinitrotoluene	< 0.56*	0.13
Hexachlorobenzene	< 0.29*	0.13
Hexachlorobutadiene	< 0.31	0.5
Hexachloroethane	< 0.57	3.0
Nitrobenzene	< 0.42	2.0
Pentachlorophenol	< 0.50	100.0
Pyridine	< 1.4*	5.0
2,4,5-Trichlorophenol	< 0.50	400.0
2,4,6-Trichlorophenol	< 0.50	2.0

TCLP results are corrected for spike recoveries.

*Matrix interference encountered in the organic extraction procedure resulted in higher than normal detection limits.

Report Approved by: Vickie M. Wynkoop
Vickie M. Wynkoop
Project Manager

SDF/L:12.1

Environmental
Science &
Engineering, Inc.

8901 N. Industrial Road
Peoria, Illinois 61615-1589
(309) 692-4422
Fax (309) 692-9364

An IEPA Contract Laboratory

REVISED DATE: 12-23-91
DATE: 11-1-91
DATE RECEIVED: 10-11-91
PROJECT NO.: 591-5249
P. O. NO.: 54177

TO: The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701
ATTN: Mr. Dean Shoemaker

ESE SAMPLE: 5047-2
SAMPLE DATE: 10-10-91
DESCRIPTION: SCCIMCOOL OIL

Parameter	TCLP Concentration (mg/l)	Maximum Allowable Concentration (mg/l)
TCLP VOLATILE ORGANIC COMPOUNDS		
METHOD NO.:	8240	
DATE ANALYZED:	10-15-91	
ANALYST:	EPL	
Benzene	< 0.05	0.5
Carbon Tetrachloride	< 0.05	0.5
Chlorobenzene	< 0.10	100.0
Chloroform	< 0.05	6.0
1,2-Dichloroethane	< 0.05	0.5
1,1-Dichloroethylene	< 0.05	0.7
Methyl ethyl ketone	0.38	200.0
Tetrachloroethylene	< 0.05	0.7
Trichloroethylene	< 0.05	0.5
Vinyl chloride	< 0.10	0.2
TCLP SEMIVOLATILE ORGANIC COMPOUNDS		
METHOD NO.:	8270	
DATE ANALYZED:	10/29-30/91	
ANALYST:	PEM	
Total Cresols (o + m + p)	0.669	200.0
1,4-Dichlorobenzene	< 0.29	7.5
2,4-Dinitrotoluene	< 0.35*	0.13
Hexachlorobenzene	< 0.42*	0.13
Hexachlorobutadiene	< 0.28	0.5
Hexachloroethane	< 0.40	3.0
Nitrobenzene	< 0.25	2.0
Pentachlorophenol	< 0.50	100.0
Pyridine	< 0.42	5.0
2,4,5-Trichlorophenol	< 0.50	400.0
2,4,6-Trichlorophenol	< 0.50	2.0

TCLP results are corrected for spike recoveries.

*Matrix interference encountered in the organic extraction procedure resulted in higher than normal detection limits.

Report Approved by: Vickie M. Wynkoop
Vickie M. Wynkoop
Project Manager

SDF/L:12.2

Environmental
Science &
Engineering, Inc.
A CILCORP Company

December 20, 1991

Mr. Dean Shoemaker
The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701

Dear Mr. Shoemaker:

Our laboratory recently analyzed two samples for The Eureka Company for the Toxicity Characteristic Leaching Process (TCLP) targets. The samples were collected 10 October, and received by our laboratory 11 October. The samples were identified on the chain of custody as SCOILMAIN OIL and SCCIMCOOL OIL (E.S.E. identification numbers 5047-1 and 5047-2, respectively). The report indicates that the semivolatile organic compounds 2,4-dinitrotoluene and hexachlorobenzene are above the regulatory limits of 0.13 mg/L for each of the two samples.

TCLP leachates are extracted for semivolatile organic analyses and analyzed by U.S. EPA SW846 Method 8270. No TCLP targets were detected. However, the reporting limits (concentrations on the report form) are determined by the instrument sensitivity, the amount of initial starting material, the final volume of the extract, and matrix spike recovery data. For these two samples, the final volume of the extracts were twenty-five times the usual volume due to high concentrations of hydrocarbon compounds. As a result, even though no TCLP targets were detected, the concentrations reported must reflect the matrix interference.

In reviewing the data and results for these two samples, I noticed two errors:

The reported pyridine result for sample SCOILMAIN OIL is above the regulatory limit of 5.0 mg/L. This was an error on our part. A corrected report will be sent to you indicating that the pyridine value is less than 1.4 mg/L. This value is above the usual reporting limits for pyridine, but well below the regulatory limit.

The vinyl chloride value of sample SCCIMCOOL OIL was reported as 0.10 mg/L. It should have been reported as less than (<). This has been corrected on the report.

If you have any questions or need more information, please call us.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Tom Johnson
GC/MS Supervisor

Vickie M. Wynkoop
Project Manager

BTJ.171

8901 North Industrial Road Peoria, IL 61615 Phone (309) 692-4422 (800) 234-1239 Fax (309) 692-9364

Environmental
Science &
Engineering, Inc.

8901 N. Industrial Road
Peoria, Illinois 61615-1589

(309) 692-4422
Fax (309) 692-9364

An IEPA Contract Laboratory

January 6, 1992

Mr. Rich Johnson
Division of Land Pollution Control
Illinois EPA
4500 S. Sixth Street Road
Springfield, IL 62706

Dear Mr. Johnson:

You recently requested further clarification of the results of two analyses our laboratory recently performed for The Eureka Company.

The two samples were identified as SCOILMAIN OIL and SCCIMCOOL OIL (E.S.E. identification numbers 5047-1 and 5047-2, respectively). The samples were extracted for the Toxicity Characteristic Leaching Process (TCLP). Two hundred milliliters of the TCLP extract of each sample was then extracted for the semivolatile organic compounds of the TCLP target list. This provided a dilution factor of 5; i.e., 200 mL of extract diluted to one liter for continuous liquid/liquid extraction.

A separate extraction for a matrix spike of the semivolatile organics of the TCLP target list was also extracted for each sample to determine the target compound recoveries from each sample. The final volume of each of the semivolatile extracts was 5 milliliters, rather than the usual 1 milliliter. This provided another dilution factor of 5 for the TCLP targets. The final effective dilution factor for each sample and its matrix spike was thus 25. This resulted from the high concentration of hydrocarbon pattern evidenced in the chromatograms of the analyses by GC/MS (U.S. EPA SW846 Method 8270 for semivolatile organics).

The analyst performed a manual search for each of the characteristic ions of the TCLP target compounds in the chromatograms of the sample analyses and the matrix spike analyses. This was necessary because of the matrix interference of each sample. No mass spectral patterns were detected within appropriate retention time windows for 2,4-dinitrotoluene and hexachlorobenzene in either sample. The detection limit used for the searches was 1 ng, which represents from 0.029 to 0.056 mg/L after corrections for dilution factors and matrix spike recoveries. This amount is one tenth of the normal instrument reporting limits, and below the regulatory limit of 0.13 mg/L for each of the target compounds of concern.

Such low values are not normally reported because they represent an undocumented extrapolation of the initial calibration of the instrument and methods used. Nevertheless, our data reduction procedures indicate that the semivolatile organic (BNA) TCLP extracts contain less than the regulatory limits of the two target compounds in question. This conclusion is consistent with information from our client, Mr. Dean Shoemaker of The Eureka Company, indicating that 2,4-dinitrotoluene and hexachlorobenzene are not utilized in the processes that produced the samples.

If you have any questions or need more information, please call us.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Tom Johnson
GC/MS Supervisor

Vickie M. Wynkoop
Project Manager

cc: Dean Shoemaker

BTJ.171(3,4)

DA Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614
Tel. (309) 692-5252

TO: The Eureka Company
1201 E. Bell Street
Bloomington, IL 61701

ATTENTION: Mr. Don Jenkins

DATE RECEIVED 8-13-86
CLIENT P.O. #
D/A PROJECT # 5060.10
DATE OF REPORT 9-3-86

D/A SAMPLE NO.		6225-12				
SAMPLE DESCRIPTION		Water Reduced paint 9:30				
SAMPLE DATE		8-7-86				
Cyanide, Total	mg/kg	< 0.12				
Sulfide	mg/kg	< 1				
Phenols	mg/kg	< 1.0				
pH	Units	* 8.3				
% Solid	%w/w	47%				
Flashpoint	°F	> 200°				
Chromium, Hexavalent	mg/kg	0.24				
Reactive Cyanide	mg/kg	< 0.12				
Reactive Sulfide	mg/kg	< 1				
EP TOXICITY						
Arsenic	ug/l	< 40				
Barium	ug/l	200				
Cadmium	ug/l	< 20				
Chromium	ug/l	90				
Lead	ug/l	< 40				
Mercury	ug/l	< 0.2				
Selenium	ug/l	< 40				
Silver	ug/l	< 20				

abbreviated report sheet

* pH is a 10% mixture in lab pure water

Analysis Certified By: John R. LaPayne

John R. LaPayne, Chief Chemist

Analysis and Testing shall be performed in accord with U.S. EPA's current manual of practice or with other procedures acceptable to U.S. EPA and IEPA.

PDC Laboratories, Inc.

CLIENT The Eureka Company

DATE RECEIVED 08-09-90

DATE OF REPORT 09-11-90

SAMPLE DESCRIPTION Paint Booth Filters

P.O. NUMBER 44148

LAB NUMBER 90080437

LAB NUMBER	ANALYSIS	RESULTS
90080437	TCLP Arsenic	0.2 mg/l
	Barium	0.12 mg/l
	Cadmium	0.2 mg/l
	Chromium	0.01 mg/l
	Lead	<0.025 mg/l
	Mercury	<0.0005 mg/l
	Selenium	<0.04 mg/l
	Silver	0.005 mg/l

Laboratory Manager

Quality Assurance Officer

TCLP-Metals:edd

PDC Laboratories, Inc.

TOXICITY CHARACTERISTIC CONSTITUENTS (TCLP)

CLIENT	The Eureka Company
DATE RECEIVED	08-09-90
DATE OF REPORT	09-11-90
SAMPLE DESCRIPTION	Paint Booth Filters
P.O. NUMBER	44148
LAB NUMBER	90080437

COMPOUND	SAMPLE CONCENTRATION mg/l	REGULATORY THRESHOLD mg/l
VOLATILES		
Vinyl Chloride	<0.2	0.2
1,1-Dichloroethene	<0.1	0.7
Chloroform	<0.1	6.0
1,2-Dichloroethane	<0.1	0.5
Carbon Tetrachloride	<0.1	0.5
Trichloroethene	<0.1	0.5
Benzene	<0.1	0.5
Tetrachloroethene	<0.1	0.7
Chlorobenzene	<0.1	100.0
1,4-Dichlorobenzene	<0.1	7.5
2-Butanone (MEK)	<0.2	200.0
BASE/NEUTRALS		
Hexachloroethane	<0.5	3.0
Hexachlorobutadiene	<0.3	0.5
2,4-Dinitrotoluene	<0.13	0.13 *
Hexachlorobenzene	<0.13	0.13 *
Pyridine	<0.2	5.0 *
Nitrobenzene	<0.2	2.0
ACIDS		
2,4,6-Trichlorophenol	<0.2	2.0
2,4,5-Trichlorophenol	<1.0	400.0
Pentachlorophenol	<1.0	100.0
o-Cresol	<0.2	200.0
m,p-Cresol	<0.2	200.0

* If the quantitation limit is greater than calculated regulatory level, the quantitation limit then becomes the regulatory level.

Laboratory Manager

Quality Assurance Officer

TCLP-1:edd

DA Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614
Tel. (309) 692-5252

The Eureka Company
1201 East Bell Street
Bloomington, IL. 61701

Attn: Mr. Don Jenkins

Date Received: 10/12/88
Date of Report: 11/01/88
Work Order: 88-10-231
Job Number:
# of Samples: 1

Work ID: Strip Waste Paint Booth Filt.
P O # : 54426

Test	Units	Waste Paint Filter
Silver, Total	mg/kg	<0.50
Arsenic, Total	mg/kg	<1.4
Barium, Total	mg/kg	730
Cadmium, Total	mg/kg	<0.25
Chromium, Total	mg/kg	5.7
Mercury, Total	mg/kg	<0.01
Lead, Total	mg/kg	75
Selenium, Total	mg/kg	<0.55
Metals Digest Nonaqueous	date of prep.	10/13/88
Barium, EP Toxicity	mg/l	0.04
Chromium, EP Toxicity	mg/l	<0.01
Lead, EP Toxicity	mg/l	0.05
EP TOX Extraction	date of prep.	10/19/88
Cyanide, Reactive	mg/kg	<1.0
Cyanide, Total	mg/kg	<1.0
Paint Filter	none	pass
Flashpoint	degrees F	>200
Phenol	mg/kg	<2.4
pH Nonaqueous	units	3.9
Reactive Sulfide	mg/kg	<7.5
Total Sulfide	mg/kg	<7.5

Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614
Tel. (309) 692-5252

Test	Units	Waste Paint Filter
Total Organic Carbon	mg/kg	>170,000
Extract. Organic Halogen	mg/kg	<40
Total Solids	%w/w	93

Certified By: D. J. C.
David J. Cirilli, Chemist

ATTACHMENT F

TANK REMOVAL CERTIFICATION

EUREKA
VACUUM CLEANERS

The Eureka Company
A Division of National
Union Electric Corporation
Bloomington, IL 61701-6902

November 30, 1988

Underground Storage Tank Program
Office of Illinois State Fire Marshall
3150 Executive Park Drive
Springfield, IL 62703-4599

Gentlemen:

In reference to our underground storage tanks located at 1201 East Bell Street, Bloomington, IL, Facility No. 4019095; The Eureka Company had previously notified your office of four underground tanks in use, these tanks were numbered 1 through 4. Tanks #2 and #3 were removed and scrapped on June 15, 1988.

The Pemco Service Company of Bloomington, IL was contracted to perform this work. Mr. Mark Segobiano, Inspector for the Bloomington Fire Department, was contacted and kept informed of the activity. It was determined that the exposed and excavated soil presented no evidence of contamination. This area has since been backfilled and concrete paved.

In regard to the above information, we request that tanks #2 and #3 be deleted from your records. Thank you for your help in this matter.

Sincerely,

Don Jenkins

Don Jenkins
Environmental Engineer

Delmar Small

Authorized Signature

Mgr/Mfg

Title

DJ:tat

(309) 828-2367
TWX 510-532-2170
TELEX 270144
Telecopier (309) 828-2367, Ext. 203

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2050-0049
APPROVAL EXPIRES 6-30-89

FOR TANKS IN **IL**

RETURN COMPLETED FORM TO: UST Coordinator, Division of Fire Prevention, P.O. Box 3803, Springfield, IL 62708-3803

STATE USE ONLY
I.D. Number
Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed $10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. **This form must be completed for each location containing underground storage tanks.** If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached: 0

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity): NATIONAL UNION ELECTRIC CORP.

Street Address: 1201 E. BELL STREET

County: McLEAN

City: BLOOMINGTON State: ILLINOIS ZIP Code: 61701

Area Code: 309 Phone Number: 828 2367

Type of Owner (Mark all that apply ☒)

- ☒ Current
- ☐ Former
- ☐ State or Local Gov't
- ☐ Federal Gov't (GSA facility I.D. no. _____)
- ☒ Private or Corporate
- ☐ Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section I, mark box here ☐)

Facility Name or Company Site Identifier, as applicable: THE EUREKA COMPANY

Street Address or State Road, as applicable: 1201 E. BELL STREET

County: McLEAN

City (nearest): BLOOMINGTON State: ILLINOIS ZIP Code: 61701

Indicate number of tanks at this location: 4

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands ☐

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here ☐): DON JENKINS

Job Title: ENVIRONMENTAL ENGINEER

Area Code: 309 Phone Number: 8282367

IV. TYPE OF NOTIFICATION

☐ Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative: V.P. OF MANUFACTURING

Signature: Frederick Waltmire

Date Signed: 4/1/86

CONTINUE ON REVERSE SIDE

Owner Name (from Section I) NAT'L UNION ELECTRIC Location (from Section II) THE EUREKA CO. Page No. 2 of 2 Pages

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 1	Tank No. 2	Tank No. 3	Tank No. 4	Tank No.
1. Status of Tank (Mark all that apply ☒)					
Currently in Use	☒	☒	☒	☒	☐
Temporarily Out of Use	☐	☐	☐	☐	☐
Permanently Out of Use	☐	☐	☐	☐	☐
Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)	6	14	14	8	
3. Estimated Total Capacity (Gallons)	560	500	500	1000	
4. Material of Construction (Mark one ☒)					
Steel	☒	☒	☒	☒	☐
Concrete	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
5. Internal Protection (Mark all that apply ☒)					
Cathodic Protection	☐	☐	☐	☐	☐
Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
None	☒	☒	☒	☒	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
6. External Protection (Mark all that apply ☒)					
Cathodic Protection	☐	☐	☐	☐	☐
Painted (e.g., asphaltic)	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
None	☒	☒	☒	☒	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
7. Piping (Mark all that apply ☒)					
Bare Steel	☐	☐	☐	☐	☐
Galvanized Steel	☒	☒	☒	☒	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Cathodically Protected	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)					
a. Empty	☐	☐	☐	☐	☐
b. Petroleum					
Diesel	☐	☐	☐	☐	☐
Kerosene	☐	☐	☐	☐	☐
Gasoline (including alcohol blends)	☒	☐	☐	☐	☐
Used Oil	☐	☐	☐	☐	☐
Other, Please Specify					
c. Hazardous Substance	☐	☒	☒	☒	☐
Please Indicate Name of Principal CERCLA Substance		TOLUENE	VM&P NAPTHA	VM&P NAPTHA	
OR					
Chemical Abstract Service (CAS) No.		108883	8030306	8030306	
Mark box ☒ if tank stores a mixture of substances	☐	☐	☒	☒	☐
d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service)					
a. Estimated date last used (mo/yr)	/	/	/	/	/
b. Estimated quantity of substance remaining (gal.)					
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)	☐	☐	☐	☐	☐

Office of the Illinois State Fire Marshal
Division of Petroleum & Chemical Safety
3150 Executive Park Drive
Springfield, Illinois 62703

Facility # 4-019095
Permit # 315
Request Rec'd 04-18-89
Date 04-19-89

PERMIT FOR REMOVAL OF
UNDERGROUND STORAGE TANKS FOR PETROLEUM AND HAZARDOUS MATERIALS

Permission to remove underground storage tank or tanks is hereby granted. Such removal shall not commence until April 28, 1989 A seventy-two (72) hour notice is required to confirm final date of the removal for confirmation of our Inspector to be on site. This Office Phone Number is 217-785-5878 or 217-785-1020. You must notify ESDA 1-800-782-7860 or IEPA 217-785-3497 within 24 hours of leaks or contaminated soil. Removal must be in accordance with acceptable closure requirements and procedures, such as API Bulletin 1604. A site assessment must be conducted to determine if a release has occurred.

1) Owner. - Corporation, Partnership or Other Business Entity:

The Eureka Company
Name
1201 E. Bell Street
Street Address
Bloomington | Illinois | 61701-6902
City | State | Zip
Loren Bean | (309)828-2367
Contact Person | Phone

2) Name and Location of Facility Where Removal is to Occur:

The Eureka Company
Name
1201 E. Bell Street
Street Address
Bloomington | McLean | 61701-2367
City | County | Zip
Loren Bean | (309)828-2367
Contact Person | Phone

3) [X] Tank Removal [ ] Abandonment in Place

a) 1-560 Gallon
1-1000 Gallon
Number and size of tanks being removed or abandoned

b) -
No longer required for our operations
Reason for removal of tanks

c)
Waiver approval letter date if abandoned in place

4) Person, Firm or Company Performing Work:

Pemco Service Co.
Name
1321 N. Mason Street
Street Address
Bloomington | Illinois | 61701-6902
City | State | Zip
(309)828-6134 | 370-90-6989
Phone | Registration No.

5) You must notify this Office when completion of tank removal has taken place, on EPA Notification Form 7530, so that appropriate records can be corrected.

Sincerely, W. Dale Tanke
W. Dale Tanke, Storage Tank Safety Engineer

cc: Local Region
Local Fire Department

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2050-0049
APPROVAL EXPIRES 6-30-88

FOR TANKS IN **IL**

RETURN COMPLETED FORM TO: UST Coordinator, Division of Fire Prevention
Office of State Fire Marshal
3150 Executive Park Drive
Springfield, IL 62703-4599

I.D. Number: STATE USE ONLY 4-019095

Date Received:

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2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

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INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. **This form must by completed for each location containing underground storage tanks.** If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached: 0

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity): National Union Electric Corp.

Street Address: 1201 E. Bell St.

County: McLean

City: Bloomington State: Ill ZIP Code: 61701

Area Code: 309 Phone Number: 828-2367

Type of Owner (*Mark all that apply* ☒)

- ☒ Current
- ☐ Former
- ☐ State or Local Gov't
- ☐ Federal Gov't (GSA facility I.D. no. _____)
- ☒ Private or Corporate
- ☐ Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here ☐)

Facility Name or Company Site Identifier, as applicable: The Eureka Company

Street Address or State Road, as applicable: 1201 E Bell St.

County: McLean

City (nearest): Bloomington State: Ill. ZIP Code: 61701

Indicate number of tanks at this location: 2

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands ☐

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here ☐): Loren Benn

Job Title: Plant Engineer

Area Code: 309 Phone Number: 828-23[illegible]

IV. TYPE OF NOTIFICATION

☐ Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative: D. K. Small, Manager of Manufacturing

Signature: D K Small

Date Signed: 4/24/89

CONTINUE ON REVERSE SIDE

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)		Tank No. 1	Tank No. 4	Tank No.	Tank No.	Tank No.
1. Status of Tank (Mark all that apply ☒)	Currently in Use	☒	☒	☐	☐	☐
	Temporarily Out of Use	☐	☐	☐	☐	☐
	Permanently Out of Use	☐	☐	☐	☐	☐
	Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)		8	11			
3. Estimated Total Capacity (Gallons)		560	1000			
4. Material of Construction (Mark one ☒)	Steel	☒	☒	☐	☐	☐
	Concrete	☐	☐	☐	☐	☐
	Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
5. Internal Protection (Mark all that apply ☒)	Cathodic Protection	☐	☐	☐	☐	☐
	Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
	None	☒	☒	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
6. External Protection (Mark all that apply ☒)	Cathodic Protection	☐	☐	☐	☐	☐
	Painted (e.g., asphaltic)	☐	☐	☐	☐	☐
	Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
	None	☒	☒	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
7. Piping (Mark all that apply ☒)	Bare Steel	☐	☐	☐	☐	☐
	Galvanized Steel	☒	☒	☐	☐	☐
	Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
	Cathodically Protected	☐	☐	☐	☐	☐
	Unknown	☐	☐	☐	☐	☐
	Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)	**a. Empty**	☐	☐	☐	☐	☐
	b. Petroleum					
	Diesel	☐	☐	☐	☐	☐
	Kerosene	☐	☐	☐	☐	☐
	Gasoline (including alcohol blends)	☒	☐	☐	☐	☐
	Used Oil	☐	☐	☐	☐	☐
	Other, Please Specify					
	c. Hazardous Substance	☐	☒	☐	☐	☐
Please Indicate Name of Principal CERCLA Substance			VM&P Naptha			
OR Chemical Abstract Service (CAS) No.			8030306			
Mark box ☒ if tank stores a mixture of substances		☐	☐	☐	☐	☐
	d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service)						
a. Estimated date last used (mo/yr)		4 / 89	4 / 89	/	/	/
b. Estimated quantity of substance remaining (gal.)						
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)		☐	☐	☐	☐	☐